

Kent County, Michigan ANALYSIS OF IMPEDIMENTS To Fair Housing Choice

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I.Introduction and Executive Summary of the Analysis

Who Conducted

I. Introduction and Executive Summary of the Analysis

Equal and free access to residential housing (housing choice) is fundamental to meeting essential needs and pursuing personal, educational, employment, or other goals. Because housing choice is so critical, fair housing is a goal that Government, public officials, and private citizens must achieve if equality of opportunity is to become a reality.

Entitlement jurisdictions, including Kent County, must become fully aware of the existence, nature, extent, and causes of all fair housing problems and the resources available to solve them. With this information, the County's Fair Housing Planning (FHP) will be able to provide measurable results. The County may waste energy and resources that it could have used more effectively with careful planning and execution. A properly completed Analysis of Impediments to Fair Housing Choice (AI) provides this information.

The scope of the AI is broad. It covers the full array of public and private policies, practices, and procedures affecting housing choice. The AI:

- Serves as the substantive, logical basis for FHP
- Provides essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates

Assists in building public support for fair housing efforts both within an entitlement jurisdiction's boundaries and beyond.

A. Who Conducted

The 2010/2011 Analysis of Impediments to Fair Housing Choice (AI) was prepared by the Kent County Community Development Department with assistance from McKenna Associates in accordance with the *Fair Housing Planning Guide*, published by the U.S. Department of Housing and Urban Development (HUD).

B. Participants

Participants in developing the AI included: Kent County elected officials, department heads, and staff; many public service agencies and organizations; the private sector; and McKenna Associates (consultants).

C. Focus Group Sessions

McKenna Associates and Kent County hosted two Focus Group sessions in early December to collect input from key stakeholders in the community. Leaders engaged in various sectors of housing were invited to attend and participate in the sessions. These included representatives of public housing providers, private developers, public service agencies, the fair housing center, and lending and financial institutions, among others. Participants provided input regarding fair housing issues in the County and methods to address and overcome these issues. Results of these sessions are provided in a summary in Appendix A (Chapter VIII).

D. Methodology Used

The Analysis of Impediments involved the following process:

- A comprehensive review of the County's laws, regulations, and administrative procedures, policies, and practices
- An assessment of how those laws, etc. affect the location, availability, and accessibility of housing
- An assessment of conditions, both public and private, affecting fair housing choice for all protected classes
- An assessment of the availability of affordable, accessible housing in a range of unit sizes

The information needed for conducting an AI includes the following:

- Public policies, practices, and procedures involving housing and housing-related activities
- Zoning and land use policies, tax assessment/abatement practices
- The nature and extent of fair housing complaints/suits or other data that may evidence the County's achievement of fair housing choice
- Demographic patterns
- Home Mortgage Disclosure Act (HMDA) data
- Results of testing
- Results of Fair Housing Initiative Program (FHIP) grants
- Patterns of occupancy in Section 8, Public and Assisted Housing, and private rental housing.

Impediments to fair housing choice include:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, family status, or national origin which restrict housing choices or the availability of housing choices
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

E. How Funded

The AI was funded using CDBG and HOME administration funds.

F. Conclusions

Following that methodology, the Analysis came to the following conclusions regarding the barriers to affordable housing present in the County and the strategies to be used to address them. These barriers and strategies are addressed in more detail throughout the report.

1. Barriers to Fair Housing and Impediments to Fair Housing Choice

Equal and free access to residential housing (housing choice) is fundamental to meeting essential needs and pursuing personal, educational, employment, or other goals. Because housing choice is so critical, affordable housing is a goal the County and the private market must achieve if equality of opportunity is to become a reality.

Barriers to new housing development over which the County has little to no control include:

- Allowable densities and location of multiple family units
- Minimum lot and building sizes, which can affect price and rent
- Location of grocery stores and other essential services

Zoning and land use related decisions such as those noted above are controlled at the local level, as opposed to the County level. That being said, the County can play a role in promoting and advocating for local zoning and land use decisions that favor as opposed to limit housing choice.

Barriers to the development and provision of affordable housing as they apply specifically to Kent County can generally be separated into six categories as follows:

1. Economic:
 - Poor credit;
 - Housing costs (mortgage and maintenance); and
 - Lost value
2. Local Policies:
 - Lack of source of income regulations (exists in only 3 communities);
 - Zoning decisions/land use policies; and
 - Failure to equitably accept housing vouchers and higher density residential development
3. Regional/National Policies:
 - New lead based paint regulations and cost to eradicate
 - Prevailing wage and associated costs

I.Introduction and Executive Summary of the Analysis

Conclusions

4. Need for increased Access:
 - Lack of public transportation linkage to out-County areas
 - Services concentrated around Grand Rapids, isolation from growing demand in out-County areas
5. Need for Fair Housing Education and Training:
 - Foreclosures bring about uneducated new investors
 - Internet marketing lacks controls to ensure fair housing choice
 - NIMBYism still a problem, will likely increase as market rebounds and demand for new single-family housing rises
 - Discrimination is unintentional or unknown
 - Steering of realtors based on perceptions of communities and/or school districts
6. Discriminatory Lending Practices:
 - Financing and Lending
 - 2006 and 2009 HMDA data demonstrate disparities in lending

Other barriers to housing choice, some of which are referenced throughout this analysis, are more wide spread throughout the region. Therefore, they were not specifically categorized above, but are worth noting:

- Affordability/Income bracket cut off levels/Rent ratio to income
- Racial steering or blockbusting by real estate brokers
- Lack of quality housing units available for lower-income individuals
- Foreclosures
- The stigma associated with “affordable” housing
- Availability of safe and decent quality housing
- Lack of and access to funding for new construction of affordable housing units
- Loan policies and procedures
- Weatherization needs
- Lack of funding for new rental housing
- Lack of housing for young adults and the elderly
- A lack of awareness within the community of all services available
- Discriminatory advertising

I.Introduction and Executive Summary of the Analysis

Conclusions

2. Strategies to Address Impediments to Fair Housing Choice

The following strategies are proposed to address the specific Kent County barriers listed [above](#) and referenced throughout this Analysis:

1. **Continue to work with an organization or agency to provide fair housing services to the County.**
 - a. The County has the opportunity through contracts with local partners and providers to address impediments to fair housing in Kent County based on needs identified in prior year.
 - b. Based on the declining number of housing test cases in recent years, determine if additional funding is available and should be targeted to increase housing testing, realizing that fair housing regulations are only as good as the enforcement thereof.
 - c. Work with the agency or organization to include religion and age discrimination in information programming to ensure that discrimination is identified, not tolerated, and properly addressed regardless of type.
 - d. Work with partner agency or agencies to expand enforcement of fair housing choice into rural areas, where such issues often go unnoticed.
2. **Research whether a Countywide Fair Housing Ordinance would be an effective tool to increase fair housing outcomes in Kent County.**
 - a. While other counties have successfully adopted fair housing ordinances, it is not a one-size-fits-all solution. Kent County may benefit from such an ordinance, but much background research would be required to estimate the feasibility of such an effort.
3. **Promote Increased Public Transportation Access and Access to Job Training** activities throughout the County.
 - a. Continue participation with The Rapid's Transit Master Plan to promote and actively participate in review of existing transportation routes to link transportation and job employment centers to where lower-income persons and families reside.
 - b. Increase capacity of fair housing providers and organizations in rural areas to promote access to resources in areas where mobility and transportation are limited.
 - c. Coordinate with local and regional planning efforts to develop efficient transportation systems and allocation of housing and land uses.

Advocate for additional adult education and vocational training opportunities, including non-English speaking alternatives.

4. **Create a Fair Housing Web Page on the Accesskent.com to increase access to fair housing resources.**
 - a. Include copies of all fair housing resources currently distributed to program participants in the Housing Choice Voucher program (tenants and property owners).
 - b. Include links to other relevant Fair Housing information sites.
 - c. Provide model language to municipalities and townships to assist in implementing Housing Plan elements by highlighting existing plans such as Kentwood.
5. **Promote County-wide Source of Income Protection.**
 - a. Explore establishment of source of income protection throughout the County.
 - b. Promote broader acceptance of vouchers and development of affordable housing county-wide through public information on the facts about Housing Choice Vouchers and their purpose.
 - c. Attend at least one meeting of the Regional Property Managers Association annually to provide information about Housing Choice Vouchers and provide a point of reference for property owners who may or may not be participating in the program.
6. **Cooperate with public/private institutions to provide better access to aid and financing through continued participation in local task forces.**
 - a. Facilitate tracking and enforcement of financing disparities through download of annual HMDA data.
 - b. Seek Spanish speaking fair housing educators to address changing demographics and assist with all aspects of home ownership/rental requirements.
7. **Further explore the reasonableness of rental registration and development of a landlord training program.**
 - a. While rental registration can be a tool for improving housing conditions, the implementation of such a program can have unintended side effects on low-income residents and non-profit housing providers. Carefully identify the objectives of rental registration and potential impacts of implementation.
 - b. Promote increased fair housing training programs and education for landlords, particularly new landlords.

I.Introduction and Executive Summary of the Analysis

Conclusions

8. Continue to support **housing inspection efforts of the Health Department and housing rehabilitation** for units identified through housing inspection activities.
 - a. Provide rehabilitation programs, particularly to elderly residents who are unable to perform basic maintenance and upkeep.
 - b. Continue to receive referrals from the Health Department for homeowners needing assistance with housing-related health and safety violations.
 - c. Support local units of government in requiring that bank-owned properties are adequately maintained to ensure safety of surrounding neighborhoods.
 - d. Ensure that minimum accessibility standards are being adhered to through strict enforcement of building codes.
9. Continue to support **affordable housing** opportunities through the HOME Investment Partnership program particularly in communities seeking to provide eligible projects that meet a diverse range of housing needs.
 - a. Incorporate visitability standards into Kent County HOME program's guidelines for new construction over the next year to increase visitable units.
 - b. Identify public-private partnerships to implement housing choice strategies- housing rehabilitation services, financial institutions, etc.

II. Kent County's Background Data

A. Demographic Data

II. Kent County's Background Data

A. Demographic Data

NOTE: For all background data tables presented throughout Section II herein, whenever data for a township is provided, the figures associated with that township include all villages located therein as may be applicable.

Population. In 2009, the total population of Kent County was estimated at 608,315 persons, an increase of 5.92% from the 574,335 persons recorded in the 2000 US Census.

There were an estimated 223,616 households in Kent County in 2009, resulting in an average household size of 2.72 persons, which is slightly less than the Ottawa County average of 2.77 persons per household.

Table 1: Population Change in Kent and Neighboring Counties, 1970-2009

Year	Kent County	Barry County	Ionia County	Montcalm County	Newaygo County	Ottawa County
1970	411,044	38,166	45,848	39,660	27,992	128,181
1980	444,506	45,781	51,815	47,555	34,917	157,174
1990	500,631	50,057	57,024	53,059	38,202	187,768
2000	574,335	58,755	61,518	61,266	47,874	238,314
2009	608,315	58,434	62,574	62,733	48,686	261,957
1970-2009 Percent Change	47.99%	53.10%	36.48%	58.18%	73.93%	104.36%
2000-2009 Percent Change	5.92%	-0.55%	1.72%	2.39%	1.70%	9.92%

Source: US Census Bureau; Population Estimates for July 1, 2009

The overall population of all adjacent counties that were analyzed has grown substantially since 1970, with an average increase of 62.34%. Since 2000, Kent County's population has increased nearly 6% with all adjacent counties increasing, except for Barry County (-0.55%).

II. Kent County's Background Data

Demographic Data

Race and Ethnicity. According to the 2009 American Community Survey, an estimated 83.7% of Kent County residents reported their race as 'white', a greater percentage than the State (79.9% white). Compared to the State overall, Kent County has a lower proportion of persons reporting as 'black or African-American' (8.9% vs. 13.9% for the State of Michigan). Other races, including more than one race account for 7.4 percent of the population in Kent County.

While the State of Michigan has a higher concentration of African-Americans than Kent County, the percentage of persons of Hispanic or Latino ancestries are greater in the County (9.5% in Kent County compared with 4.2% in the State of Michigan). Persons of Hispanic ancestry were concentrated in the cities of Grand Rapids and Wyoming, with an estimated percentage of Hispanic-origin residents in 2009 of 18.8% and 15.5%, respectively.

As shown in the table below and on the following page, the areas of highest racial minority concentration (calculated as percentage of residents who reported their race as anything other than 'white') are located in Alpine Twp. (10.2%), Gaines Twp. (10.6%), Kentwood (19.2%), Wyoming (15.7%) and Grand Rapids (33%). At the community-wide level there are no 'majority-minority' places in the County. That being said, there are likely majority-minority census tracts in the County, particularly in more densely populated areas. Because this is a county-wide analysis, demographic information and analysis has been presented and completed at the community level, as opposed to the census tract level.

The highest percentage of minority residents is in Grand Rapids, with 33% non-white persons in 2000. It is important to note that Grand Rapids is not eligible for Kent County's CDBG funding, as Grand Rapids is a separate entitlement community.

Table 2: Population and Race/Ethnicity by County Subdivision, Kent County, 2000

Location	Total Persons	White	Black	Some Other Race	More than one Race	Percent Non-White	Hispanic or Latino	Percent Hispanic or Latino
Kent County	574,335	477,058	51,480	32,913	12,884	16.9%	40,018	7.0%
Kent County CDBG*	307,123	285,975	7,891	9,199	4,058	6.9%	7,482	2.4%
Ada Twp	9,882	9,405	70	269	138	4.8%	112	1.1%
Algoma Twp	7,596	7,390	0	111	95	2.7%	72	0.9%
Alpine Twp	14,088	12,651	490	809	138	10.2%	901	6.4%
Bowne Twp	2,755	2,639	0	90	26	4.2%	100	3.6%

II. Kent County's Background Data

A. Demographic Data

Location	Total Persons	White	Black	Some Other Race	More than one Race	Percent Non-White	Hispanic or Latino	Percent Hispanic or Latino
Byron Twp	17,611	16,587	290	352	382	5.8%	400	2.3%
Caledonia Twp	8,964	8,810	15	123	16	1.7%	42	0.5%
Cannon Twp	12,086	11,850	56	115	65	2.0%	24	0.2%
Cascade Twp	15,107	14,429	189	397	92	4.5%	167	1.1%
Cedar Springs	3,163	3,075	20	39	29	2.8%	132	4.2%
Courtland Twp	5,803	5,696	29	27	51	1.8%	62	1.1%
East Grand Rapids	10,783	10,560	97	103	23	2.1%	191	1.8%
Gaines Twp	20,054	17,931	1,055	612	456	10.6%	674	3.4%
Grand Rapids	197,846	132,623	40,330	18,146	6,747	33.0%	25,814	13.0%
Grand Rapids Charter Twp	14,035	13,544	180	209	102	3.5%	141	1.0%
Grandville	16,263	15,370	318	346	229	5.5%	468	2.9%
Grattan Twp	3,540	3,432	7	36	65	3.1%	103	2.9%
Kentwood	45,239	36,565	4,111	3,550	1,013	19.2%	1,723	3.8%
Lowell	3,853	3,745	0	86	22	2.8%	69	1.8%
Lowell Twp	5,201	5,100	9	52	40	1.9%	57	1.1%
Nelson Twp	4,098	3,961	15	83	39	3.3%	75	1.8%
Oakfield Twp	5,072	4,937	30	49	56	2.7%	49	1.0%
Plainfield Twp	30,104	28,734	413	668	289	4.6%	524	1.7%
Rockford	4,626	4,425	16	116	69	4.3%	87	1.9%
Solon Twp	4,628	4,514	25	35	54	2.5%	56	1.2%
Sparta Twp	8,938	8,675	50	120	93	2.9%	284	3.2%
Spencer Twp	3,748	3,582	44	38	84	4.4%	71	1.9%

II. Kent County's Background Data

Demographic Data

Location	Total Persons	White	Black	Some Other Race	More than one Race	Percent Non-White	Hispanic or Latino	Percent Hispanic or Latino
Tyrone Twp	4,314	4,163	5	85	61	3.5%	225	5.2%
Vergennes Twp	3,777	3,664	16	92	5	3.0%	84	2.2%
Walker	21,795	20,541	341	587	326	5.8%	589	2.7%
Wyoming	69,366	58,460	3,259	5,568	2,079	15.7%	6,722	9.7%

Source: US Census Bureau, 2000; Individual race categories include persons of Hispanic or Latino ethnicity; Village data is included within the townships in which they are located.

*Kent County CDBG consists of Kent County values minus applicable values for the Cities of Grand Rapids and Wyoming, as Grand Rapids and Wyoming are separate entitlement communities and do not receive CDBG funds from Kent County.

II. Kent County's Background Data

B. Income Data

B. Income Data

1. Income and Poverty

Based on the income figures published by the US Department of Housing and Urban Development, the median family income (MFI) for the Grand Rapids-Wyoming MI County for 2010 was \$62,500. The following 2010 median family income limits are used to evaluate income and poverty for various HUD-based assistance programs:*

- 30% of the median family income is \$16,900 (very-low income)
- 50% of the median family income is \$28,150 (low income)
- 80% of the median family income limit is \$45,000 (moderate income)

*limits based upon a 3 person family due to the County's 2009 estimated household size of 2.72 persons

[Table 3](#) below shows median family income data for Kent County according to the 2009 Comprehensive Housing Affordability Strategy (CHAS) data. The 2009 CHAS data utilizes slightly different income limits and terminology (AMI [Area Median Income] vs. HAMFI [HUD Adjusted Median Family Income]) than the 2000 CHAS data.

Table 3: Median Family Income & HUD Income Limits, Kent County, 2009

Location	Total Households (2009)	Median Family Income* (2009)	30% AMI** or less	31-50% AMI	50.1-80% AMI	80.1-95% AMI	95.1% AMI or Above	Percent of households <80.1% AMI
Kent County	225,250	\$57,242	24,205	24,335	40,105	19,255	117,350	39.4%
Source: US Census; American Community Survey 2009, 2009 CHAS Data *Median family income in the past 12 months (in 2009 inflation-adjusted dollars) **AMI = Area Median Income, a term utilized in the 2009 CHAS Data (applicable to locations w/ > 60,000 population only)								

According to 2009 estimates, in Kent County, 10.7% of households are very-low-income, another 10.8% are low-income, and 17.8% are moderate income; in total, (39.4%) of the County's households earn less than 80% of the area median income.

II.Kent County's Background Data

Income Data

Table 4: Median Family Income & HUD Income Limits by County Subdivision, Kent County, 2000

Location	Total Households (2000)	Median Family Income (1999)	HAMFI <30% (very low income)	HAMFI 31-50% (low income)	HAMFI 51-80% (moderate income)	Percent of households <80% HAMFI
Kent County	212,828	\$54,770	20,533	22,035	40,134	38.9%
Kent County CDBG*	113,084	n/a	7,168	9,433	18,629	31.1%
Ada Twp	3,216	\$87,972	81	82	297	14.3%
Algoma Twp	2,580	\$62,863	174	99	408	26.4%
Alpine Twp	5,537	\$50,068	454	646	1,098	39.7%
Bowne Twp	881	\$61,544	32	48	110	21.6%
Byron Twp	6,463	\$56,701	352	575	1,179	32.6%
Caledonia Twp	3,104	\$69,836	143	157	320	20.0%
Cannon Twp	3,923	\$76,805	119	214	397	18.6%
Cascade Twp	5,367	\$98,013	170	291	452	17.0%
Cedar Springs	1,143	\$42,250	177	141	262	50.7%
Courtland Twp	1,869	\$69,306	77	69	203	18.7%
East Grand Rapids	3,798	\$98,967	128	120	246	13.0%
Gaines Twp	7,446	\$56,402	386	766	1,365	33.8%
Grand Rapids	73,236	\$44,224	11,108	9,700	15,583	49.7%
Grand Rapids Charter Twp	4,823	\$76,021	220	281	511	21.0%
Grandville	6,099	\$55,047	341	658	1,236	36.6%
Grattan Twp	1,252	\$62,148	42	87	206	26.8%
Kentwood	18,379	\$55,615	1,413	1,796	3,584	37.0%
Lowell	1,479	\$49,145	115	180	304	40.5%

II. Kent County's Background Data

B. Income Data

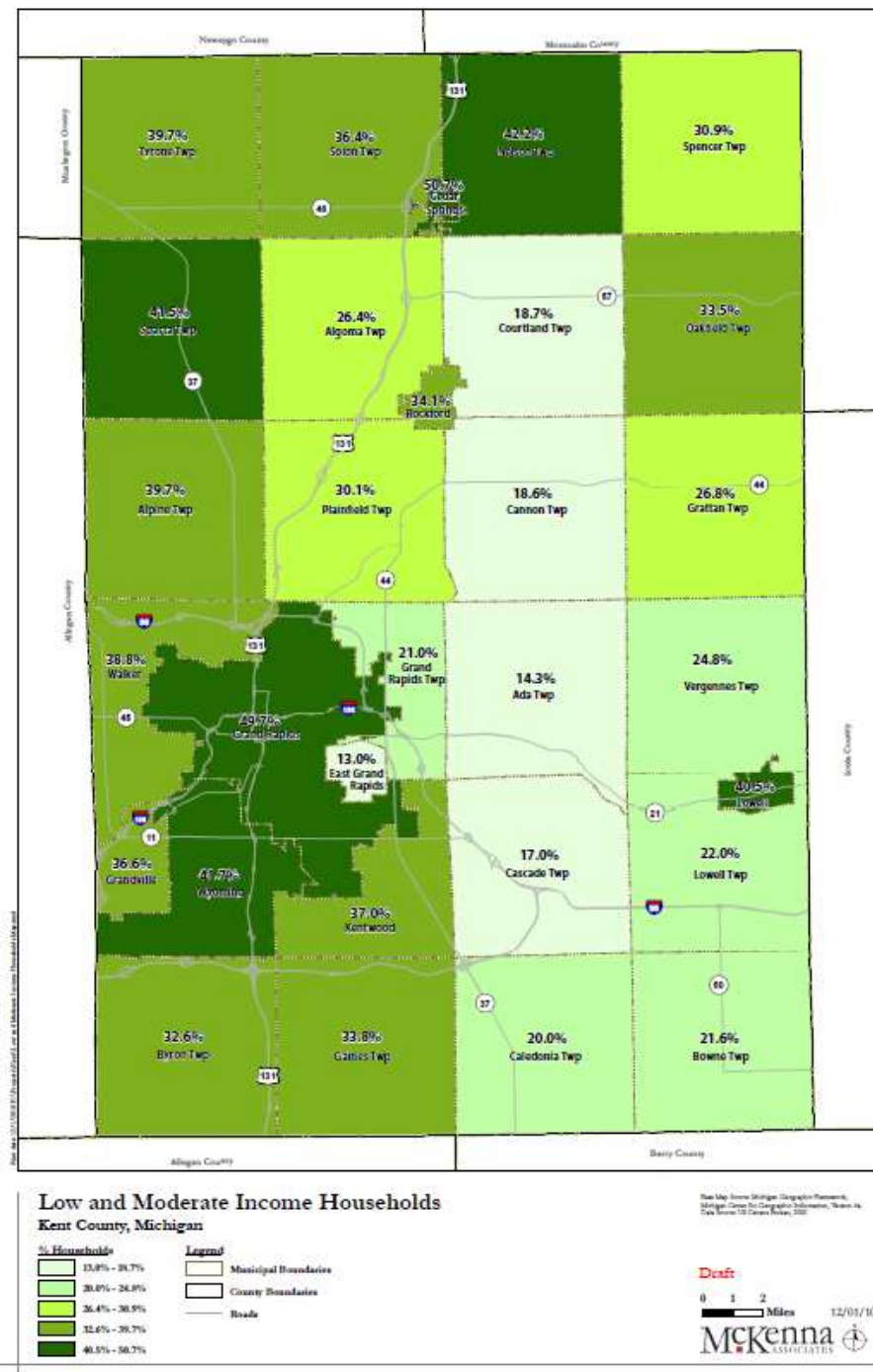
Location	Total Households (2000)	Median Family Income (1999)	HAMFI <30% (very low income)	HAMFI 31-50% (low income)	HAMFI 51-80% (moderate income)	Percent of households <80% HAMFI
Lowell Twp	1,683	\$65,395	97	129	145	22.0%
Nelson Twp	1,419	\$54,375	170	189	240	42.2%
Oakfield Twp	1,810	\$51,866	116	108	382	33.5%
Plainfield Twp	11,006	\$62,241	674	859	1,780	30.1%
Rockford	1,674	\$55,954	172	177	221	34.1%
Solon Twp	1,628	\$50,439	106	113	373	36.4%
Sparta Twp	3,317	\$49,491	295	338	742	41.5%
Spencer Twp	1,380	\$55,475	153	49	225	30.9%
Tyrone Twp	1,497	\$51,750	127	171	297	39.7%
Vergennes Twp	1,161	\$62,313	68	69	151	24.8%
Walker	8,795	\$58,912	661	902	1,850	38.8%
Wyoming	26,508	\$50,002	2,239	2,902	5,922	41.7%
Sources: US Dept of Housing and Urban Development analysis of Census 2000 data; HAMFI = HUD-adjusted Area Median Family Income; Village data is included within the townships in which they are located. *Kent County CDBG consists of Kent County values minus applicable values for the Cities of Grand Rapids and Wyoming, as Grand Rapids and Wyoming are separate entitlement communities and do not receive CDBG funds from Kent County.						

The table [above](#) lists the number of households in Kent County and all County subdivisions in 2000 that are in each of the three income categories. Between 2000 and 2009, the percentage of households below the 80% moderate-income threshold in Kent County increased by 0.5%. Seven county subdivisions had a higher percentage of households below the 80% moderate-income threshold than that of Kent County in 2000, with Cedar Springs having the highest at 50.7%. The map on page [17](#) indicates that the location of Kent County communities with the highest percentages of very-low-income, low-income, and moderate-income households are scattered throughout. There is not a general geographic pattern displayed by the data.

II. Kent County's Background Data

B. Income Data

Map 1: Low and Moderate Income Households



II. Kent County's Background Data

C. Employment Data

C. Employment Data

The following table lists major employers in Kent County, ranked by the number of total employees (full and part-time) as of the fourth quarter of 2009. As businesses expand and relocate to Kent County, the demand for more housing choices will increase.

Table 5: Major Employers, Kent County, 2009

Employer	Type of Business	Employees
Spectrum Health	Hospital and medical care	16,092
Meijer Inc.	Groceries & General Merchandise	7,421
Steelcase Inc.	Furniture Manufacturer	4,800
Spartan Stores, Inc.	Groceries	4,200
Amway Corporation	Personal care; contract manufacturers	4,000
Axios Incorporated	Human resources & employment services	3,522
Grand Rapids Public Schools	Education	3,463
Saint Mary's Health Care	Hospital and medical care	2,672
MetroHealth Hospital	Hospital and medical care	2,163
Kent County	Government	1,841
Grand Rapids Community College	College	1,808
Lacks Enterprises, Inc.	Plastics for Automotive/Electronics	1,750
Calvin College	College	1,700
City of Grand Rapids	Government	1,675
Wolverine World Wide, Inc.	Footwear and leather products	1,640
U.S. Postal Service	Postal delivery	1,633
GE Aviation Systems LLC	Military and commercial avionics systems	1,600
Gordon Food Service Inc.	Food services wholesaler	1,600

II. Kent County's Background Data

Employment Data

Employer	Type of Business	Employees
Hope Network	Rehabilitation services	1,436
PineRest Christian Hospital	Hospital and mental care	1,375
Consumers Energy	Public utility	1,370
Roskam Baking Co.	Bakery	1,300
Rockford Public Schools	Education	1,296
Forest Hills Public School	Education	1,290
MMPC	Multi-specialty physician group	1,248
Kentwood Public Schools	Education	1,150
Sara Lee Corporation	Bakery	1,125
Holland Home	Retirement community	1,100
United Parcel Service	Parcel delivery	1,037
Benteler Automotive Corporation	Automotive components	920
Priority Health	Healthcare Insurance	800
ADAC Automotive	Automotive	800
Huntington National Bank	Banking	796
Dematic Corp.	Material handling systems	770
Mary Free Bed Rehabilitation Hospital	Rehabilitation services	750
Fifth Third	Banking	678
Knoll, Inc.	Wood and metal office systems	650
Delphi Corporation	Automotive	622
Cascade Engineering	Plastic injection molded systems	550
Amway Grand Plaza Hotel	Hotel and restaurants	506
Source: The Right Place, Inc., 2010		

According to The Right Place (Source: Applied Geographic Solutions, 2008), the labor force in Kent County is projected to grow by 3.7% between 2008 and 2013.

II. Kent County's Background Data

D. Housing Profile

D. Housing Profile

Nearly three-quarters of the housing in Kent County is owner-occupied; of these units, 48.4% were built prior to 1960 and 60.7% built prior to 1970. The median age of rental housing is 38 years, with 36.5% of rental units built after 1980.

Table 6: Occupied Housing Units by Tenure and Age of Structure, Kent County, 2009

	Owner Occupied	%	Renter Occupied	%	Total Units
2005 and newer	5,731	2.6%	1,490	0.7%	7,221
2000-2004	15,872	7.1%	2,547	1.1%	18,419
1990-1999	23,999	10.7%	8,667	3.9%	32,666
1980-1989	17,610	7.9%	10,129	4.5%	27,739
1970-1979	19,869	8.9%	9,966	4.5%	29,835
1960-1969	16,936	7.6%	6,314	2.8%	23,250
1950-1959	24,785	11.1%	6,371	2.8%	31,156
1940-1949	12,395	5.5%	3,018	1.3%	15,413
1939 or earlier	23,820	10.7%	14,097	6.3%	37,917
Total	161,017	72.0%	62,599	28.0%	223,616

Source: US Census Bureau: 2009 American Community Survey

Kent County has a smaller proportion of mobile homes, or manufactured housing units, as compared to the State as a whole. Often, the operators of manufactured housing parks are not fully aware of housing assistance programs that may be available to support residents with special housing needs. Additionally, many manufactured homes suffer from disrepair and may present a cost burden to residents.

II. Kent County's Background Data

Housing Profile

Table 7: Mobile Homes as Percentage of Total Housing Units, 2009

	Kent County	State of Michigan
Total Housing Units	244,840	4,541,470
Mobile Homes	8,819	249,885
% Mobile Homes	3.60%	5.50%
Source: US Census, 2009 American Community Survey		

The table below displays the percentage of owner-occupied, renter-occupied and vacant housing units by county subdivision within Kent County, along with the percentage of households earning less than 80% of HAMFI. General trends in the data include higher vacancy rates and a greater prevalence of low- and moderate-income households in tracts with higher percentages of rental housing units. Some notable exceptions to these trends are Grattan and Spencer Townships, which have greater than 13% units vacant but a low percentage of low and moderate income households; and Lowell, Nelson Twp. and Tyrone Twp. which all have a higher percentage of low- and moderate-income households than would generally be expected for county subdivisions with a high percentage of owner-occupied units and low vacancy rates.

Table 8: Residential Tenure and Vacancy Rate by County Subdivision, Kent County, 2000

Location	Total Units	Owner Occupied	%	Renter Occupied	%	Vacant	%	Percent of households <80% HAMFI
Kent County	224,000	149,679	66.82%	63,211	28.22%	11,110	4.96%	38.9%
Kent County CDBG*	118,534	88,014	74.25%	25,123	21.19%	5,397	4.55%	31.1%
Ada Twp	3,384	3,090	91.31%	173	5.11%	121	3.58%	14.3%
Algoma Twp	2,692	2,481	92.16%	107	3.97%	104	3.86%	26.4%
Alpine Twp	5,830	3,100	53.17%	2,450	42.02%	280	4.80%	39.7%
Bowne Twp	906	804	88.74%	76	8.39%	26	2.87%	21.6%
Byron Twp	6,712	5,293	78.86%	1,161	17.30%	258	3.84%	32.6%
Caledonia Twp	3,225	2,761	85.61%	314	9.74%	150	4.65%	20.0%

II.Kent County's Background Data

D. Housing Profile

Location	Total Units	Owner Occupied	%	Renter Occupied	%	Vacant	%	Percent of households <80% HAMFI
Cannon Twp	4,174	3,637	87.13%	276	6.61%	261	6.25%	18.6%
Cascade Twp	5,638	5,009	88.84%	385	6.83%	244	4.33%	17.0%
Cedar Springs	1,175	731	62.21%	384	32.68%	60	5.11%	50.7%
Courtland Twp	2,022	1,853	91.64%	83	4.10%	86	4.25%	18.7%
East Grand Rapids	3,940	3,584	90.96%	251	6.37%	105	2.66%	13.0%
Gaines Twp	7,789	5,339	68.55%	2,162	27.76%	288	3.70%	33.8%
Grand Rapids	77,960	43,717	56.08%	29,500	37.84%	4,743	6.08%	49.7%
Grand Rapids Charter Twp	5,000	4,337	86.74%	515	10.30%	148	2.96%	21.0%
Grandville	6,279	4,483	71.40%	1,612	25.67%	184	2.93%	36.6%
Grattan Twp	1,428	1,142	79.97%	93	6.51%	193	13.52%	26.8%
Kentwood	19,507	11,262	57.73%	7,215	36.99%	1,030	5.28%	37.0%
Lowell	1,564	1,028	65.73%	464	29.67%	72	4.60%	40.5%
Lowell Twp	1,764	1,608	91.16%	118	6.69%	38	2.15%	22.0%
Nelson Twp	1,499	1,281	85.46%	146	9.74%	72	4.80%	42.2%
Oakfield Twp	1,973	1,671	84.69%	143	7.25%	159	8.06%	33.5%
Plainfield Twp	11,456	9,064	79.12%	1,974	17.23%	418	3.65%	30.1%
Rockford	1,796	1,155	64.31%	586	32.63%	55	3.06%	34.1%
Solon Twp	1,778	1,565	88.02%	117	6.58%	96	5.40%	36.4%
Sparta Twp	3,449	2,609	75.65%	692	20.06%	148	4.29%	41.5%
Spencer Twp	1,641	1,256	76.54%	101	6.15%	284	17.31%	30.9%
Tyrone Twp	1,503	1,287	85.63%	162	10.78%	54	3.59%	39.7%
Vergennes Twp	1,209	1,071	88.59%	71	5.87%	67	5.54%	24.8%

II. Kent County's Background Data

Housing Profile

Location	Total Units	Owner Occupied	%	Renter Occupied	%	Vacant	%	Percent of households <80% HAMFI
Walker	9,201	5,513	59.92%	3,292	35.78%	396	4.30%	38.8%
Wyoming	27,506	17,948	65.25%	8,588	31.22%	970	3.53%	41.7%
Source: US Census Bureau 2000; Village data is included within the townships in which they are located. *Kent County CDBG consists of Kent County values minus applicable values for the Cities of Grand Rapids and Wyoming, as Grand Rapids and Wyoming are separate entitlement communities and do not receive CDBG funds from Kent County.								

II. Kent County's Background Data

E. Maps

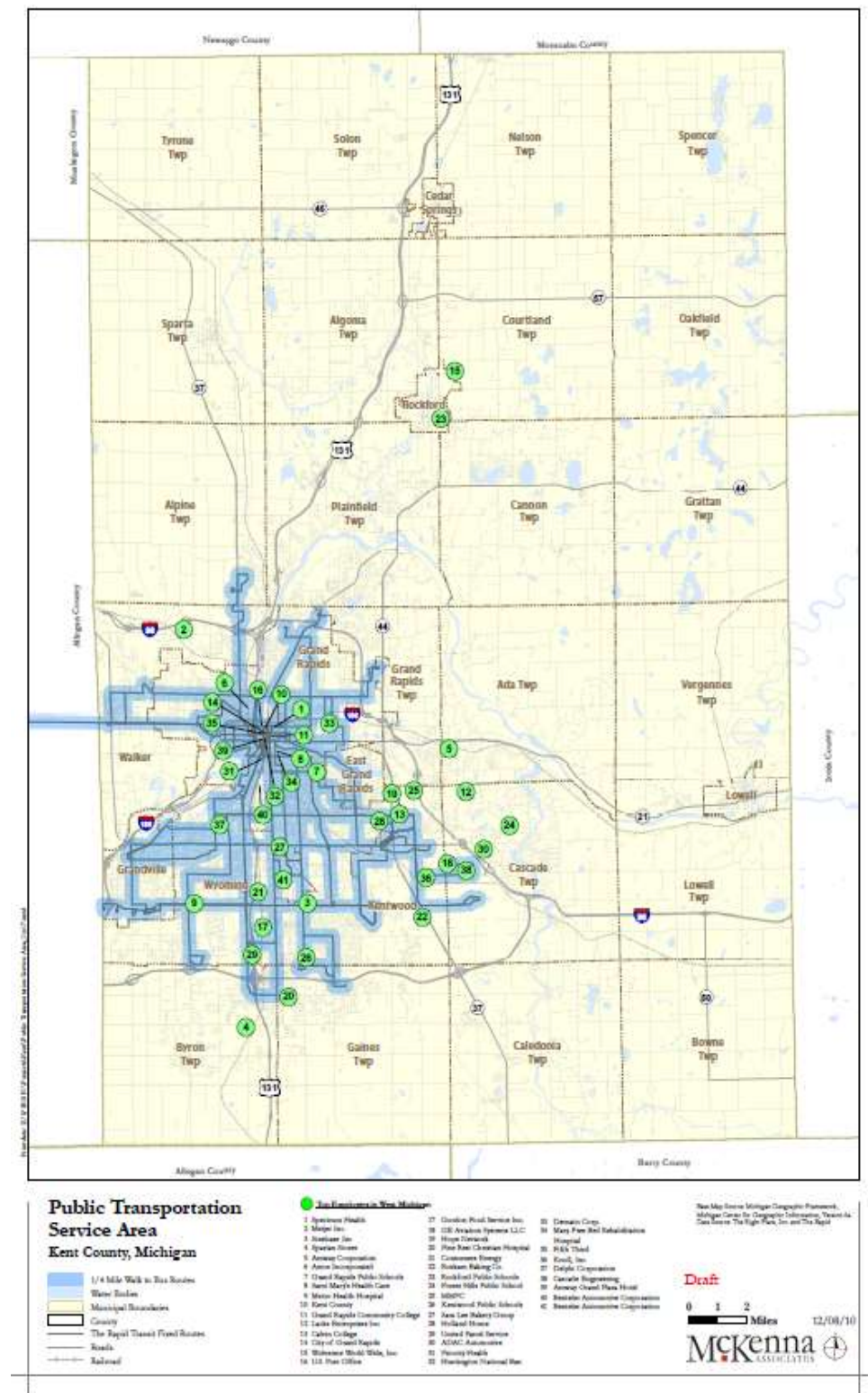
E. Maps

The following maps provide additional background information as discussed elsewhere in this document and were utilized in developing strategies throughout the Analysis: Map 2 – Public Transportation Service Area Map; Map 3 – Racial Minority Concentration; and Map 4 – Disabled Population.

II. Kent County's Background Data

E. Maps

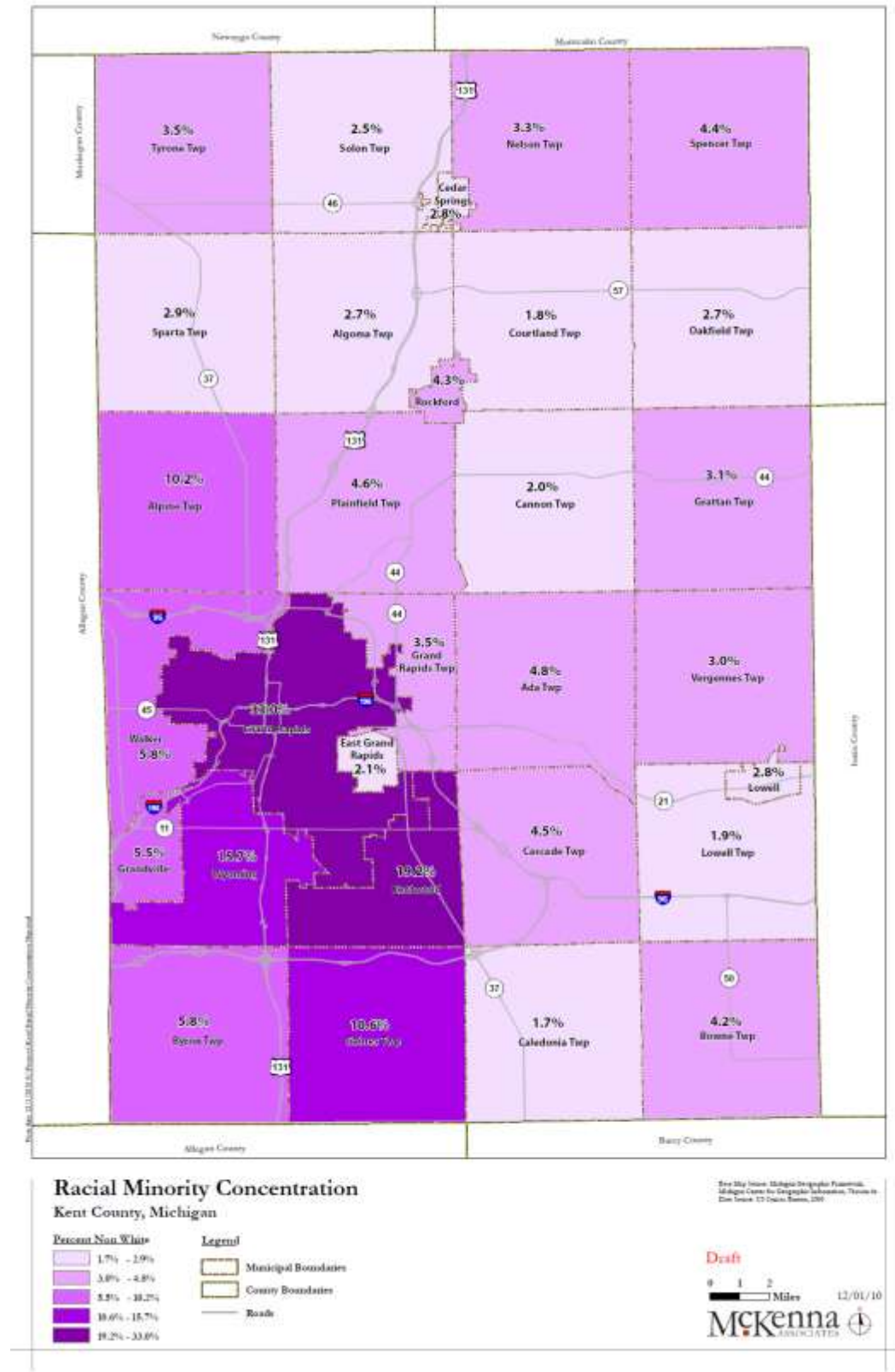
Map 2: Public Transportation Service Area



II. Kent County's Background Data

E. Maps

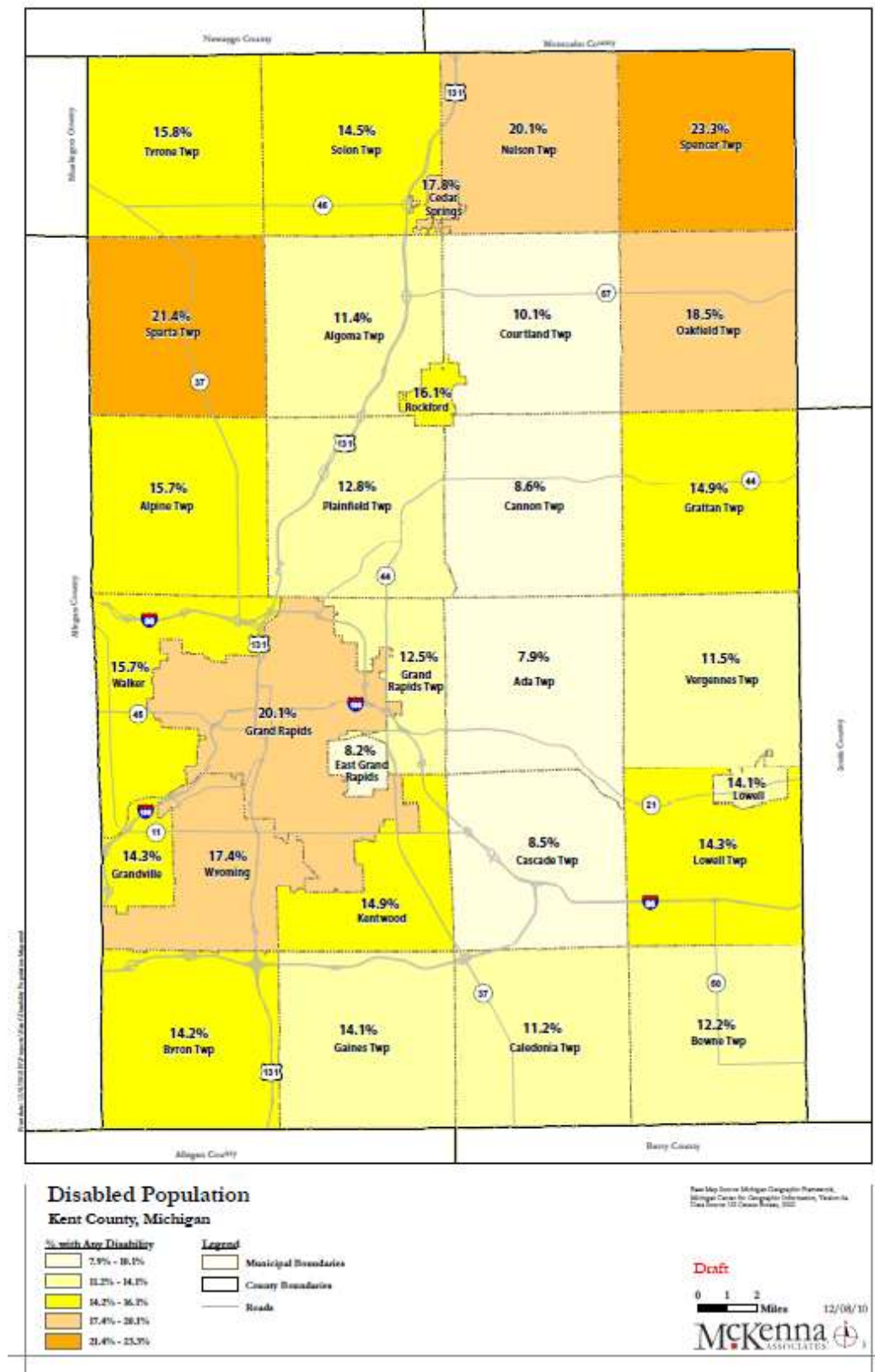
Map 3: Racial Minority Concentration



II. Kent County's Background Data

E. Maps

Map 4: Disabled Population



III. Evaluation of Current Fair Housing Legal Status

A. Fair housing complaints or compliance reviews

III. Evaluation of Current Fair Housing Legal Status

A. Fair housing complaints or compliance reviews

Refer to Appendix B (Chapter VIII) for information regarding fair housing complaints for Kent County communities, as filed with the State of Michigan Department of Civil Rights. [Table 22: Open Fair Housing Discrimination Cases; 2009-January 2011](#) displays all open fair housing discrimination cases for 2009-January 2011 where a Kent County community is shown in the discrimination location, claimant address or respondent address. There are a total of 16 open cases; 4 in 2009; 11 in 2010 and 1 thus far in 2011. The FHCWM is the claimant in 2 open cases. According to information provided by the Michigan Department of Civil Rights, several open cases listed craigslist.org as the respondent; however, we were unable to determine the discrimination location, claimant address or respondent address for such cases and, therefore could not verify applicability to a Kent County community. As a result, these open cases are not shown in Table 22.

[Table 23: Closed Fair Housing Discrimination Cases; 2008-2010](#) includes all closed fair housing discrimination cases from 2008 to 2010 where a Kent County community is shown in the discrimination address, claimant address or respondent address. There are a total of 42 closed cases; 5 in 2008, 16 in 2009 and 21 in 2010. The FHCWM is the claimant in 10 closed cases. 7 cases were closed due to a withdrawal where the respondent made an unspecified adjustment to satisfactorily address the discrimination claim. 8 cases were closed as a result of a settlement agreement being reached between parties.

III.Evaluation of Current Fair Housing Legal Status

B. Fair Housing Practices Ordinance

B. Fair Housing Practices Ordinance

Although the County has a Narrative Statement Regarding Affirmatively Furthering Fair Housing which expresses the County's commitment to Fair Housing, Kent County does not currently have a Fair Housing Practices Ordinance. Adoption of a Fair Housing Practices Ordinance allows a County to: 1) codify Fair Housing Planning in the County; 2) recognize the Fair Housing Planning practices that the County or partner entities are already undertaking; 3) further legitimize the County's existing fair housing strategies (such as Kent County's July 18, 2006 Narrative Statement Regarding Affirmatively Furthering Fair Housing); and 4) provide a checks and balances mechanism to ensure that partner entities are furthering the Fair Housing Planning goals of the County. Although the County is already covered by Federal regulations regarding fair housing, providing locally based regulations allows for an additional layer of enforcement while also allowing the opportunity to add additional standards or customized regulations to the Federal requirements.

Furthermore, a Fair Housing Practices Ordinance provides greater standing and protection in the form of an ordinance rather than a narrative statement.

For Kent County, such an Ordinance would require a significant amount of research and coordination with the communities within the County prior to adoption to ensure agreement and proper implementation. The Fair Housing Center of West Michigan would likely be the entity spearheading the development of the Ordinance and generating consensus, although certainly the County would work with FHCWM through the adoption process. The goal of the Ordinance would be to legislate the following:

1. Investigate complaints of unlawful housing practices;
2. Initiate complaints of unlawful housing practices on the basis of studies carried out by its staff or volunteers;
3. Endeavor, by conciliation, to resolve unlawful housing complaints;
4. Hold hearings, subpoena witnesses and required the production of any books or papers relating to any matter under investigation;
5. Render a full written report to the County Commissioners on an annual basis all of the activities and recommendations of the Fair Housing Board;
6. Recommend to the County Commissioners educational or other programs designed to promote fair housing;
7. Adopt rules and procedures for the conduct of its business; and
8. Complete such other acts that are necessary to perform other duties charged under the Ordinance.

III.Evaluation of Current Fair Housing Legal Status

C. Fair housing discrimination suits filed by the Department of Justice or private plaintiffs

None known of at this time.

D. Reasons for any trends or patterns

The data does not present any trends or patterns in discrimination complaints. However, anecdotal discussions during Focus Group meetings indicate that complaints have seemed to increase. Rather than attributing this to an increase in fair housing violations and issues, most attributed this to increased awareness and education about the role of the Fair Housing Center and the process for issuing complaints.

III.Evaluation of Current Fair Housing Legal Status

E. Discussion of other fair housing concerns or problems

E. Discussion of other fair housing concerns or problems

The organizations dedicated to mitigating fair housing impediments, investigating fair housing complaints and increasing awareness of fair housing in Kent County are the Fair Housing Center of West Michigan [FHCWM] and the Michigan Department of Civil Rights. Currently, Kent County contracts with the FHCWM to provide fair housing testing, complaint assistance, and information dissemination.

As outlined in the historical examples of Township opposition to development of multi-family housing developments and affordable rental housing and favoritism toward more costly large-lot single family development (refer to the conversation with Kendra Wills regarding High Density Development), neighborhood opposition is often an impediment to fair housing choice. This impediment and public sentiment is not unique to the communities within Kent County.

Although negative perceptions about affordable housing still exist today, public outreach and education activities undertaken by the FHCWM, Lighthouse Communities, and similar organizations serve to clarify and correctly define in the public's mind what is "affordable." As a result of this education, many individuals come to realize that their perceptions are not entirely accurate and that a greater percentage of the population or someone they know is considered "low/moderate income." The change in public perceptions or the stigma associated with affordable housing is not going to change overnight and will be incremental. That being said, education programs continue to make progress toward breaking down those perceptual impediments to fair housing.

The County can be a catalyst to this change and encourage integration and diversity by promoting mixed-use and mixed-income developments, which permit both residential and commercial uses.

The following table ([Table 9](#)) contains a summary of fair housing activities performed by FHCWM, formerly the Fair Housing Center of Greater Grand Rapids. The FHCWM provides fair housing services for the County on a contractual basis.

III.Evaluation of Current Fair Housing Legal Status

Discussion of other fair housing concerns or problems

Table 9: Summary of Fair Housing Activities, 2005-2010

Contract Period	Housing Testing (# of tests per contract terms)	% Discrimination for Conclusive Tests (based on housing availability or price difference)	Complaint Assistance (# by residents in CDBG service area)	Visual Survey (% of testing sites w/ posted info)	Information Dissemination (# of instances)
10/1/04 - 9/30/05	100	38% (36 of 96)	26	59% (20 of 34 sites)	41
10/1/05 - 9/30/06*	50	43% (19 of 44)	16	75% (34 of 45 sites)	67
10/1/06 - 6/30/07	30	37% (10 of 27)	27	46% (17 of 31 sites)	90
7/1/07 - 6/30/08	30	21% (6 of 29)	10	61% (14 of 23 sites)	232
7/1/08 - 6/30/09	32	30% (9 of 30)	9	81% (13 of 16 sites)	203
7/1/09 - 6/30/10	32	32% (9 of 28)	2	80% (8 of 10 sites)	161
*Due to contract execution issues, majority of services performed between July 1- Sept. 30 Source: Fair Housing Center of Greater Grand Rapids, presently dba Fair Housing Center of West Michigan Final Performance Reports					

In terms of testing, the quantity of tests being performed per the contract terms has steadily decreased from a minimum of 100 per 12 month period in 2004/05 to the current level of around 30, which has been the case since 2006.

The percentage of conclusive tests displaying discrimination was lowest in 2006/07 (21%), highest in 2005/06 (43%) and has remained at or near 30 percent since 2008.

Complaint assistance has steadily decreased to only 2 cases in 2009/10 from highs of 26 in 2004/05 and 27 in 2006/07. The decrease in complaint assistance to residents in the Kent County CDBG Service Area (excludes Wyoming and Grand Rapids) could be a function of individuals not coming forward with complaints, or a decrease in the actual number of complaints being filed.

The FHCWM performs visual surveys of testing sites to ensure that required fair housing materials are posted in conspicuous locations. The percentage of testing sites with posted materials has steadily increased from 46% in 2006/07 to 80% in 2009/10. Another positive trend is the continually increased effort to disseminate fair housing choice information.

IV. Identification of Impediments of Fair Housing Choice

A. Public Sector

IV. Identification of Impediments of Fair Housing Choice

A. Public Sector

1. Zoning and Site Selection

An evaluation of Zoning Ordinance requirements in several Kent County communities was conducted to determine if the regulations limit or exclude housing facilities for persons with disabilities or other housing for low income individuals from certain residential areas.

In order to evaluate the zoning and site selection qualities of various communities throughout Kent County a survey was distributed to community staff members (refer to Appendix B: [Zoning, Site Selection, and Property Tax Policy Survey Results](#) in Chapter VIII for a summary of the survey results). The survey asked questions regarding:

- i. Largest and smallest minimum lot sizes for residential uses;
- ii. Presence or absence of accessibility standards designed to accommodate disabled individuals;
- iii. Access for multi-family development to grocery stores and/or fresh food;
- iv. Degree of isolation between multifamily development and commercial development; and
- v. Percentage of land dedicated to multi-family residential uses.

A review of the survey results shows a general acceptance toward and options available to developers that would accommodate multi-family or duplex (two-family) residential development.

Key findings related to each of the above zoning-related survey questions and additional information contained in Zoning Ordinances include:

i. Density.

Most communities permit between 6 and 12 dwelling units per acre, which would accommodate multi-family development in at least one residential district.

ii. Accessibility Standards above Federal ADA requirements.

None of the communities surveyed included standards beyond those required by the Americans with Disabilities Act.

iii. Access to Grocery Stores/Fresh Food.

Responses were mixed, with some communities providing wide access and others providing little or no access to grocery stores and/or fresh food for residents of multi-family developments.

IV. Identification of Impediments of Fair Housing Choice

Public Sector

iv. Degree of Isolation between High-Density Residential and Commercial Uses.

Most communities indicated that commercial uses were somewhat isolated or interspersed (i.e. located in close proximity to multi-family development.) Three communities noted isolation between uses.

Of particular note was the Grattan Township Zoning Ordinance which requires that the Planning Commission consider, "The accessibility to convenience services, such as shopping, banking, health care, and public transportation; to employment opportunities; and to community resources and agencies" when reviewing applications for state licensed residential facilities. It should be noted that state licensed residential facilities can be single, duplex or multi-family residential uses. The Township's direct reference to access to neighborhood amenities, employment opportunities and service providers is in-line with Fair Housing Planning Principles. The Township's inclusion of these elements in the Zoning Ordinance is an example of a policy decision that can be made at the local level to directly eliminate an impediment to fair housing choice.

v. Percentage of Land Dedicated to Multi-Family Use.

Responses were mixed, with one community containing greater than 25% and one community with 10-25% of land zoned for multi-family use. Most surveyed communities within the County contained between 1 and 10% of land zoned for multifamily use.

vi. Other comments.

A few communities whose regulations were reviewed contained Planned Unit Development options, which encourage and accommodate mixed use development. In general, mixed use development inherently provides increased housing options and the greatest degree of housing choice.

IV. Identification of Impediments of Fair Housing Choice

A. Public Sector

2. Grand Valley Metropolitan Council.

The County is a member of the Grand Valley Metropolitan Council (GVMC), which is the Metropolitan Planning Organization for Allegan, Barry, Ionia, Kent, Montcalm, and Ottawa counties. According to the organization's stated mission, there appears to be at least an indirect focus on housing and housing related issues and problems from a regional perspective. The GVMC's website references the following social-equity related elements in their mission statement:

- "Advocate, plan for, and coordinate the provision of services and investments which have environmental, economic and social impact.
- Preserving and enhancing the natural, social, and physical environments
- Promoting economic vitality and employment opportunities
- Recognizing the strengths and benefits of diversity
- Promoting quality lifelong educational opportunities
- Developing a sensible and environmentally sound transportation system to serve all population groups
- Effectively utilizing and enhancing existing infrastructure
- Effectively advocating for financial equity and other assistance with the State and Federal governments
- Conserving and enhancing healthy neighborhoods, business districts and employment centers
- Promoting a high quality of life now and for future generations"

IV. Identification of Impediments of Fair Housing Choice

A. Public Sector

3. Zoning Interview with Kendra Wills, AICP (Extension Educator, MSU Extension; Greening Michigan Institute; Staff person to the Kent County Agricultural Preservation Board; Project Consultant to United Growth for Kent County, Inc.):

- i. *High Density Development.*

In the 1990's and early 2000's there were several multi-family housing developments proposed in outlying Townships of the County. These developments faced significant opposition from neighbors and community residents, often resulting in legal action. In recent years, proposed development has ceased due to the downturn in the housing market and general state of the economy. The results of the municipal survey presented earlier would seem to indicate that communities would be more receptive to such development today. This may be influenced as much by a change in perception as by an economic need of the municipality for new development. Nonetheless, without new development occurring, it is difficult to evaluate that question.

In general, Townships seem to have a greater resistance to developing new multi-family housing developments than more urbanized Cities and Villages in the County. One example is Sparta Village and Sparta Township, where the Village wanted to annex land to accommodate an apartment complex as part of a New Urban-designed planned unit development project. However, the project was met with significant public opposition by Township residents. The market has since declined and the project was never completed.

The same type of situation occurred in Alpine Township where a small lot single family dwelling project was proposed. The Township refused a zoning change requested by the developer to accommodate higher density. The applicant appealed the denial of the proposed rezoning, and the project went to court, resulting in a compromise followed by a referendum.

Townships that contain a village seem more accepting of higher density development. The willingness to accept higher density development depends upon the context and character of surrounding development. Communities tend to draw a line in the sand and permit higher density development only in specific locations often near or adjacent to the Village rather than permitting a mix of high and low development within the same project.

Denser development is concentrated in areas closer to Grand Rapids, where the population being served is greatest. In addition, public transportation facilities and services in the County are concentrated in and around Grand Rapids. However, the location of foreclosures throughout the County indicates that poverty and income issues are spatially changing and are no longer concentrated in inner city areas, but throughout outlying townships as

IV. Identification of Impediments of Fair Housing Choice

Public Sector

well. As a result, the need for lower-income housing and greater housing choice is greater than ever, particularly in outlying townships.

Fair housing education efforts have also aided in positively impacting the public's negative perception regarding high density development and affordable housing. Although progress has been made with regard to counteracting negative perceptions, public education efforts should continue to be an integral part of the County's fair housing practices.

ii. New Development and Land Preservation.

New development is beginning to occur in and around the City of Grand Rapids again. The County's Agricultural Land Preservation Board sees itself working on a regional basis to create areas where higher density development is encouraged and appropriate through preservation of land in other less appropriate areas. No land designated on future land use maps for future development – such as commercial, industrial, or utilities – will be eligible for agricultural preservation by the County. This strategy will encourage growth adjacent to cities and villages and serve to locate density in strategic areas. This regional approach to future land use should increase the probability of successful high density development in the near future.

iii. Mixed Income Neighborhoods.

Mixed income neighborhoods exist in some of the established suburbs, but not within newer, high growth, exurban areas of the County. As these proliferate, the stigma attached to affordable housing will be removed.

iv. Promote Fair Housing Choice.

Ms. Wills mentioned the following elements as methods to help promote fair housing choice throughout the County:

- Promote mixed income development
- Advocate for transportation improvements
- Promote transit-linked mortgages whereby banks provide reduced interest rates to individuals who choose to live adjacent to or within close proximity to transit routes and commit to using public transportation. Reduced rates stem from reduced car maintenance-related costs.

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Fair Housing Strategies (The end of each section from this point forward will contain fair housing strategies which are focused on the issues discussed in that particular section. The strategies are based upon fair housing principles referenced throughout each section and will be incorporated into the [*Recommendations and Action Items*](#) section at the end of the report. Note that some strategies may already be in the process of being implemented either by the County directly or partner entities such as the Fair Housing Center of West Michigan):

- Encourage review and updating of Kent County community Zoning Ordinances on a regular basis to foster inclusion of lower-income housing, including housing accessible to persons with disabilities and families with children in developments intended for households with lower incomes.
- Promote increasing the scope and provision for inclusionary zoning to further promote the development of affordable housing.
- Continue to encourage mixed-use zoning that allows low income residents to obtain groceries, education, jobs, and other basic services without a vehicle.
- Promote public-private partnerships between local financial institutions and policy makers to further the concept of transit linked mortgages and similar based incentives.
- Encourage incentives to promote mixed-income housing development, such as increasing the number of new units that can be built in a given development in exchange for dedication of a certain percent of the units for low and moderate-income households.

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4. Master Plans

Several Master Plan documents for communities within Kent County contain some reference, either direct or indirect, to promoting fair housing and social equity. Various Kent County communities' Master Plans were reviewed for policies and recommendations that support housing choice and the provision of equitable housing and strong neighborhoods. A summary of the type of recommendations found in the documents that were reviewed are as follows:

i. Alpine Township:

Information below from Alpine Twp. Master Plan (adopted 12/17/07)-all from Pg. 9.

Goal 2: Plan for safe, creative, and desirable residential neighborhoods that are suitable for people of varying ages, lifestyles, and incomes.

- **Objective 3:** Encourage the creative development of new residential areas when and where appropriate through the use of planned unit developments (PUD's);
 - **Strategy:** Adopt ordinances which allow flexibility regarding lot size and area, building setbacks, and design and dwelling unit types within a single unified development.
 - **Strategy:** Ensure that PUD ordinances apply to a range of housing densities, not just traditional subdivisions.

ii. Bowne Township:

Information below from Bowne Twp Master Plan (7/06)-all from Page 19.

Residential Goal: Identify appropriate locations for optional housing types, such as multiple family in locations that afford the necessary services and infrastructure.

- **Policy:** Adopt Planned Unit Development provisions in the Township Zoning Ordinance.

iii. Cannon Township:

Information below from Cannon Twp Master Plan (No Date)-all from Page 2-6.

Housing and Neighborhoods Objective:

- Encourage senior citizen housing opportunities in area served by public utilities and other supporting services such as recreation and shopping.

Commercial Development Objective:

- Prepare regulations for the development of the Village PUD.

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While the above items are pro-housing choice, the following Cannon Township objective is decidedly exclusionary in nature:

Housing and Neighborhoods Objective:

- Ensure while meeting the [above objectives] that detached, site constructed, single family homes remain the predominant housing type.

iv. Courtland Township:

Information below from Courtland Twp Master Plan (No Date).

Residential Goal 3: Courtland Township will include a diverse range of housing densities, and high-quality styles, with an emphasis on greater density in those areas of the Township with the infrastructure to support it. (Pg. 69).

Future Land Use- Moderate Density Residential Category Narrative: The Moderate Density Residential designation is intended to accommodate residential options for people of varying age and income levels formed in inviting communities. For example this [future land use] designation is expected to serve more affordable single-family homes on smaller lots or townhomes and duplexes in a congregated setting...This classification comprises 190 acres or about 0.8% of the Township's land area. Development types include senior living facilities, single family detached homes or multi-unit buildings developed in clusters, depending on the availability of utilities. (Pg. 79)

v. City of Cedar Springs:

Information below from Cedar Springs 2010 Master Plan Update (No Date).

Downtown Living Narrative of Community Analysis section: While Cedar Springs will remain a predominantly detached, single-family home community, as family sizes shrink, alternative housing choices are needed. Downtown provides an opportunity for a diverse mix of housing types in conjunction with traditional storefronts. Potential for diverse housing downtown—flats above storefronts, townhouses, and live/work units—may accommodate young adults and seniors who often most desire close proximity to services, recreation, and shopping. The city should also plan to accommodate a senior-living complex in the mixed-use area downtown. (Pg. 7)

The Plan's **Action Plan- Housing Items** (Pg. 22) includes the following:

- Ensure compliance with property maintenance standards so landlords are accountable.
- Continue programs that encourage homeownership while providing affordable, but quality rental options.

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- Promote new residential development to diversify housing choices.
- Promote a senior housing development near downtown.

vi. *City of Kentwood:*

Information below from Kentwood 2005 Master Plan Update (all from Pg. 45).

Housing Key Issues: The City of Kentwood is committed to ensuring a diverse range of housing options and alternatives.

- Kentwood seeks to balance rental and owner-occupied units at a ratio of 70/30. As of the 2000 Census, 61% of the City's housing units were owner-occupied, up from 54% in 1990.
- The redevelopment of the 28th and 29th St should include additional residential density.
- All transit corridors have the potential for Transit Oriented Development, which would include mixed-use development and high-density residential uses.
- Diverse housing options such as condominiums, townhouses, and attached single-family homes should be encouraged.
- Higher-density residential is particularly appropriate for areas surrounding primary intersections and neighborhood business centers. In some of these areas – 44th Street and Division Avenue, Breton Avenue and 44th Street, the 28th and 29th Street corridor – existing single family residential homes may create opportunities for redevelopment as higher-density housing or mixed-use development.

Kentwood Housing Action Items:

- Conduct a detailed housing study for the purpose of inventorying the existing housing stock, examining the range of housing options and identifying the amount and location of affordable housing.
- Develop a flexible approach to encourage the development of higher-density residential and mixed-use areas adjacent to, or as a part of, neighborhood business districts that makes provision for and avoids displacement of lower income households.
- Adopt guidelines for Transit Oriented Developments that encourage mixed-use development with a higher proportion of residential units along or in close proximity to major transit routes.

vii. *City of Wyoming:*

Information below from Wyoming's Land Use Plan 2020 (Pgs. 21 and 22).

Future Land Use- Part 2 Strategies of Appendix 2 Strategies for Implementation

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- Actively seek to provide affordable housing opportunities for young families, the next generation of homeowners in the community.
- Encourage the use of planned unit development to achieve a mix of residential types, styles, and densities in attractive, walkable environments.
- Increase residential densities in mixed-use and older commercial areas to ensure a sufficient population to support businesses and create a vibrant atmosphere.
- Acquire and assemble vacant and underutilized properties within the Downtown Center, in particular, and recruit prospective developers to redevelop these areas with high density residential, office, and entertainment uses.

Other priorities and initiatives focused on improving neighborhood safety and quality include:

- Support metropolitan efforts to establish a regular, dependable, and efficient mode of public transit to serve the community.
- Cluster employment centers in order to facilitate efficient and cost-effective transit service.

viii. Conclusions:

Major neighborhood and housing issues identified in Master Plans throughout the County include residential property maintenance (and enforcement), varying residential densities, provision for adjacent amenities, and improved transportation options.

Fair Housing Strategies:

- Explore creation of a County-wide master plan that addresses housing and housing-related issues on a regional scale.
- Promote regular review of Kent County community's Plans to ensure continued focus on housing and housing-related issues (i.e., homelessness, housing choice) from both a metropolitan and regional perspective.
- Highlight new housing projects that meet fair housing objectives through public media events sponsored by the County.

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5. Neighborhood Revitalization, Municipal and Other Services Employment-Housing-Transportation Linkage

One aspect of fair housing choice is neighborhood revitalization and the provision of good services to areas in which low and moderate income families live. Blacks, Hispanics, and other urban minorities and persons with disabilities who are most concentrated in such neighborhoods will benefit from better neighborhood environments so critical to good housing.

Frequently, the quality or extent of public services and facilities including schools, recreational facilities and programs, social service programs, parks, roads, transportation, street lighting, trash collection, street cleaning, crime prevention, and police protection activities varies dramatically among residential neighborhoods. Lower-income, densely populated residential areas too often lack the level and array of services that are provided in less impacted, more affluent neighborhoods. Kent County should strive to equalize services as part of FHP.

i. Job Training.

The table below includes a list of institutions and agencies that provide job training within Kent County. The table was generated with assistance from MichiganWorks staff as well as the Michigan Department of Energy, Labor and Economic Growth's Career Education Consumer Report (www.mycareereducation.org). Contact information for these entities is available through the above link and/or each agency or institution's website.

Table 10: Institutions and/or Agencies Providing Job Training

A+B CDL Inc.	Jubilee Jobs, Inc.
Advance Medical Training	Kuyper College
Aquinas College	Life EMS Education Centre
Beacon Learning Centers - Grand Rapids	Michigan HRDI
Beautystars Cosmetology College	Michigan Indian Employment & Training
Blue Heron Academy of Healing Arts - Grand Rapids	Michigan State University - Inst. of Agricultural Tech. Kent
Building Science Academy	New Horizons of MI - Grand Rapids
Burton Electric Training	Northwood University - Grand Rapids
Central Michigan Univ. Off-Campus Programs - Grand Rapids	Other Way Ministries

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Chic University of Cosmetology - GR db Empire Beauty	PC Pro Schools of Grand Rapids
Compass Film Academy	Rivertown CDL Academy LLC
Cornerstone University - Grand Rapids	Ross Innovative Employment Solutions
Davenport University - Grand Rapids	Ross Medical Education Cnt-Grand Rapids
Everest Institute - Grand Rapids	Sanford-Brown - Grand Rapids
Excel Academies of Cosmetology-Kentwood	Select Training Services
Ferris State University - Grand Rapids	Senior Community Service Employment Program
Fisher/Unitech 3DU - Grand Rapids	Spring Arbor University - Grand Rapids
Gerald R. Ford Job Corps Center	Star Professional Driving School-Kentwood
Goodwill Industries of Grand Rapids	Stepping Stones Educational System, Inc.
Grand Rapids Community College	Telamon Corporation
Grand Rapids Opportunities for Women	Valley training Center - Grand Rapids
Grand Valley State University - Continuing Education	Walker Medical Instructional Services
Great Lakes EMS Academy	West Michigan CDL, Inc. - Grandville
Hope Network	West Michigan Center for Arts & Technology
Institute for Sanative Arts	Western Michigan University - Grand Rapids
International Cosmetology Academy	Women's Resource Center
ITT Technical Institute - Grand Rapids	

ii. Transportation Linkage.

The Rapid provides local bus transportation to the following communities, which pay a millage to support public transportation service: Byron Twp., Cascade Twp., East Grand Rapids, Gaines Twp., Grandville, Grand Rapids, Kentwood, Walker, and Wyoming. The Rapid operates 26 fixed-routes operating at various times ranging from 5:00 AM to 11:30 PM on weekdays and 6:30 AM to 10:00 PM on Saturdays and 7:00 AM to 7:00 PM Sundays.

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The Rapid also provides a GO!Bus Service for seniors (age 65 and older) and disabled persons, to cover locations not directly served by the fixed routes. GO!Bus service operates during the hours that fixed-route service is running, with the exception of New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. Pick-ups must be scheduled a day in advance. The GO!Bus service area is concentrated in Downtown Grand Rapids, extreme northern parts of Byron and Gaines Townships, and extreme western parts of Cascade and Ada Township.

In addition to fixed routes and GO!Bus service, the Rapid also offers the following services:

- **County Connection:** A service that provides 24 hour transportation to anywhere in Kent County for \$14 per person one way (kids under 5 ride free) when reservations are made a day or more in advance. Same day service is provided for \$19, depending upon availability.
- **RideLink:** Transportation to persons 60 or older to anywhere in Kent County. Donations of \$2 per trip are encouraged. Registration is required and transportation is provided 8 AM to 5 PM Monday-Friday. RideLink is funded through the Kent County Senior Millage.
- **PASS:** A service that will provide transportation to the nearest Rapid bus stop for those living more than 1/3 of a mile from a fixed bus line. The cost is \$3 and rides must be arranged at least a day in advance. PASS service is limited to Grand Rapids, East Grand Rapids, Grandville, Kentwood, Walker, and Wyoming. PASS cannot make trips to or from townships.
- **Travel Training:** One-on-one training for people with disabilities. The trainer plans routes, rides with the individual during training, and maintains contact to monitor progress of the individual.

All Rapid routes are lift equipped (accessible) and seniors pay 75 cents to ride the bus as an alternative to GO!Bus service.

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The table below describes The Rapidfare schedule as of 12/2010 according to www.ridetherapid.org:

Table 11: The Rapid Fare Schedules

Single Ride Fares	Fares
Adult Cash	\$1.50
Children under 42 inches	Free, w/ fare-paying adult
Senior/disabled cash fare with ID, proof of disability	\$0.75
GOiBus Fares	Fares (1-way)
People with disabilities	\$3.00
Non-disabled people over 65	\$7.00
Source: www.ridetherapid.org , Dec, 2010	

North Kent Transit. The Hope Network provides transportation services to physically or mentally disabled seniors (60+) who reside in Kent County's northern cities and townships. Fares range from \$4-\$7.00 per trip and the service is available Monday-Friday from 8AM to 4:30PM for medical appointments, recreational activities and to/from employment. Participating Kent County communities include: Plainfield Twp., Algoma Twp., Cannon Twp., Courtland Twp., City of Lowell, Lowell Twp., Grattan Twp., Oakfield Twp., City of Rockford, Village of Sand Lake, Solon Twp., Village of Sparta, Spencer Twp., Tyrone Twp., and Vergennes Twp.

Specialized Transportation Service is available to those with disabilities who are employed but, as a result of their disability, cannot ride the public transit system. More information is available at: www.hopenetwork.org.

As part of the current Analysis of Impediments, existing local bus routes were plotted and analyzed to determine access from residential neighborhoods to major employers (listed in Section II, C, above). A quarter mile radius was used, which is a typical 5-minute walking distance for the average person.

Seven of Kent County's top 41 employers shown on [Map 2: Public Transportation Service Area](#) are located more than ¼ mile from an existing bus route. Residential areas located in areas adjacent to the City of Grand Rapids and surrounding municipalities such as northwestern Gaines Township, northeastern Cascade Township, southwest Ada Township and southern Plainfield Township do not have bus service within a ¼ mile of homes. The lack of convenient access via public transit from residential areas to major employers could be an impediment to housing choice for some individuals.

Intercity rail service is provided by Amtrak, which maintains a station in Grand Rapids. Direct rail connections are available to Chicago. Commercial air service

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is provided via Gerald R. Ford International Airport; The Rapid operates a fixed bus line to the airport.

Kent County Transit Needs Assessment. The Grand Valley Metropolitan Council, in cooperation with Interurban Transit Partnership/The Rapid received a Service Development New Technology grant from MDOT to conduct a Kent County transit needs assessment. The purpose of the assessment is to determine the unmet need and demand for transit in Kent County, particularly those areas not currently served by The Rapid. Final presentations of the study results are expected in February 2011.

If the results are similar to the discussions that were held with the Focus Groups, then they are likely to find that the lack of public transit options create a significant housing burden for the outlying communities. The lack of an affordable, efficient, easy, transportation option makes it very challenging for residents in these communities to access needed services and/or employment opportunities. While the population density or anticipated demand may not warrant additional routes in these areas, alternatives to address these obstacles must be developed in order to address this in the outlying areas.

Fair Housing Strategies:

- Review existing public transportation routes to link transportation and job employment centers to where lower-income persons and families reside.
- Support the implementation of the recommendations of the Kent County Transit Needs Assessment to fill in gaps in service throughout the County.

iii. Non-Motorized Transportation.

The Grand Valley Metropolitan Council continually updates a Non-Motorized Plan for the entire planning area which includes Kent County. The 2009 draft Plan outlines existing and planned non-motorized facilities throughout the County with existing facilities of some sort (Bicycle Lanes, Shared Use Paths, or Sidewalks) present in 17 jurisdictions. As expected, most existing facilities are concentrated in and around Grand Rapids and adjacent municipalities. However, a significant network of shared use paths traverses Byron, Caledonia, Bowne, Lowell, Vergennes, Grattan, Courtland, Algoma, Nelson, and Tyrone Townships. Ada and Cascade Township also contain significant non-motorized path connections to the existing network of paths to the west.

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Most proposed non-motorized path improvements are located in the southernmost third of the County, with the furthest north path improvement located in Cannon Township.

In general, the non-motorized plan covers Kent County well, with multiple connections between residential (including low-income) areas, parks, and commercial centers. A number of the major industrial employers in the County, particularly in Grand Rapids, Grandville, Kentwood, and Wyoming, are located within $\frac{1}{4}$ mile of existing or proposed trails, serving to enable employment access for persons dependent on non-motorized transportation.

Fair Housing Strategies:

- Support the implementation of the Plan Vision, Goals, and Study Recommendations of the GVMC Non-Motorized Plan to connect all Kent County communities with destinations such as jobs, schools, social service agencies and parks.
- Support additional spur or loop trail routes to connect major employers to the County-wide greenways system, particularly in the northern two-thirds of the County, which seem to be under-represented in terms of proposed non-motorized transportation improvements.

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6. Public Housing Commission (PHC) and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders

The following information was provided by Linda Likely, Director, Kent County Housing and Community Development Department.

i. *Spatial and Racial Composition of Section 8 Voucher Recipients*

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Table 12 on the following page displays the racial, age, disability and locational composition of Kent County Section 8 voucher recipients. 54% of all Kent County vouchers are held by minorities, all but 5 of which were distributed to African Americans (4 American Indian, 1 Asian). A total of 1,069 individuals benefitted (see # Family Total column of Table 12) from the 360 vouchers provided, and 199 of those individuals (19%) were disabled.

In terms of spatial distribution of voucher allocation, a review of zip codes indicates a good degree of dispersion throughout the County as communities north (Cedar Springs and Rockford), south (Wyoming and Alto), east (Lowell) and west of Grand Rapids (Comstock Park and Grandville) all contained voucher recipients.

The number and percentage of individuals living with vouchers outside of the City of Grand Rapids is low, pointing to the need for the Housing Commission to continue working with the FHCWM or other partner entities to facilitate greater distribution of voucher-holder unit selection in out-county areas. 63 or 17.5% of all vouchers provided to Kent County residents were utilized in zip codes located solely outside of the City of Grand Rapids. These 63 voucher recipients served 171 individuals and included 10.2% (20) of the total minority voucher recipients (196) and 31.7% of the total recipients outside of Grand Rapids (63). 18% (36 of 199) disabled voucher recipients were located in zip codes located solely outside of Grand Rapids.

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Table 12: Composition of Kent County Housing Commission Section 8 Voucher Recipients

Zip Code	City/Twp	Total Vouchers	# White	# Minority	% Minority	Avg Age	Age Range	Avg # Family	# Family Range	# Family Total	# disabled	% of Family Total disabled
49302	Alto , Lowell Twp, Bowne Twp, Cascade Twp, Courtland Twp	2	2	0	0%	49	41 - 57	5.5	5 - 6	11	0	0%
49319	Cedar Springs , Nelson Twp, Courtland Twp, Solon Twp, Algoma Twp	1	1	0	0%	34	NA	4	NA	4	0	0%
49321	Comstock Pk. , Plainfield Twp, Alpine Twp, Algoma Twp	8	6	2	25%	44	31 - 61	2.88	1 - 5	23	4	17%
49331	Lowell , Vergennes Twp, Lowell Twp, Keene Twp (Ionia), Boston Twp (Ionia)	6	5	1	17%	46	34 - 62	2.83	1 - 6	17	3	18%
49341	Rockford , Algoma Twp, Courtland Twp, Plainfield Twp, Cannon Twp	1	1	0	0%	57	NA	1	NA	1	1	100%
49418	Grandville , Georgetown Twp (Ottawa), Jamestown Twp (Ottawa)	9	8	1	11%	49	31 - 60	2.33	1 - 4	21	6	29%
49503	Grand Rapids	36	17	19 (1 Am. Ind.)	53%	39	22 - 57	3.39	1 - 8	122	14	11%
49504	Grand Rapids , Walker	51	36	15 (1 Asian)	29%	42	26 - 95	3.41	1 - 6	174	26	15%
49505	Grand Rapids , Grand Rapids Twp	35	15	20	57%	38	19 - 63	3.49	1 - 8	122	21	17%
49506	Grand Rapids , East Grand Rapids	22	7	15	68%	42	26 - 61	3	1 - 6	66	19	29%
49507	Grand Rapids , Wyoming	47	12	35 (1 Am. Ind.)	74%	41	21 - 75	3.57	1 - 8	168	20	12%
49508	Grand Rapids , Kentwood, Gaines Twp	45	9	36 (1 Am. Ind.)	80%	46	26 - 83	2.53	1 - 6	114	22	19%
49509	Wyoming	24	15	9	38%	40	25 - 63	2.96	1 - 6	71	20	28%
49512	Grand Rapids , Kentwood, Cascade Twp	12	7	5	42%	53	31 - 95	1.67	1 - 4	20	7	35%
49519	Wyoming	12	5	7	58%	40	30 - 51	1.92	1 - 5	23	2	9%
49525	Grand Rapids , Plainfield Twp, Grand Rapids Twp, Ada Twp	6	4	2	33%	43	30 - 52	3	1 - 5	18	3	17%

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Zip Code	City/Twp	Total Vouchers	# White	# Minority	% Minority	Avg Age	Age Range	Avg # Family	# Family Range	# Family Total	# disabled	% of Family Total disabled
49534	Grand Rapids , Walker, Tallmadge Twp (Ottawa)	1	1	0	0%	33	NA	5	NA	5	0	0%
49544	Grand Rapids , Walker, Alpine Twp	8	2	6	75%	49	29 - 64	1.88	1 - 5	15	5	33%
49546	Grand Rapids , Cascade Twp, Ada Twp, Grand Rapids Twp, Kentwood	14	3	11 (1 Am. Ind.)	79%	42	28 - 82	2.5	1 - 4	35	8	23%
49548	Grand Rapids , Kentwood, Gaines Twp, Byron Twp	20	10	10	50%	48	27 - 65	1.95	1 - 4	39	18	46%
Totals		360	166	194	54%	44		3		1,069	199	19%
Source: Kent County Community Development Department, 2011 Note: The City in bold under "City/Twp" is the city designated by the post office for that zip code. Other cities or townships identified in the column are communities that are covered by the geography of the zip code boundary.												

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ii. Housing Choice for Voucher Holders

The Kent County Housing Commission takes the following steps to promote housing choice for Housing Choice Voucher holders:

1. Information about fair housing rights and responsibilities is provided to families and individuals when they attend their orientation session and receive their voucher. The information provided includes a brochure entitled "Fair Housing Is the Law" published by the Fair Housing Center of West Michigan. The information describes what the fair housing law covers so the Voucher holder understands their rights. It instructs voucher holders to contact the Fair Housing Center if they have been discriminated against. In addition, each Voucher Holder receives the HUD publication "Are You a Victim of Housing Discrimination?"
2. During annual recertification voucher holders are provided with information on fair housing laws and practices.
3. The Housing Commission provides information on the Michigan Housing Locator, which displays the equal housing opportunity logo.
4. Information about fair housing is provided to landlords who participate in the Housing Choice Voucher program.
5. Fair Housing information is communicated to Resident Advisory Council members at their annual meeting.
6. Staff participates in annual fair housing center training workshops to learn about recent trends in fair housing enforcement and court cases.

At the orientation, staff talks with voucher holders about opportunities to live county-wide, and a map of the county jurisdiction is provided in their orientation packet. Staff is able to provide a list of units available throughout the County through the Michigan Housing Locator upon request for voucher holders who do not have internet access.

iii. Use of Vouchers Outside of Local Geographic Jurisdiction

The Kent County Housing Commission works cooperatively through Jurisdictional Mobility Agreements with the Wyoming Housing Commission and Grand Rapids Housing Commission which increases voucher holders' housing options. The agreement allows voucher holders to move across jurisdictional boundaries without porting their voucher.

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iv. Income, Residency and Local Preference

Applicants do not receive disparate treatment based on their income. Kent County Housing Commission does not have a residency requirement or local preference in place.

v. Assistance to Voucher Holders from Other Jurisdictions

The Kent County Housing Commission assists Housing Choice Voucher holders who have received their vouchers from other jurisdictions by absorbing persons from other jurisdictions to the greatest extent possible, i.e. allowing them to “port-in.”

vi. Assistance to Voucher Holders with Disabilities

The Kent County Housing Commission has made persons with disabilities a preference on the waitlist. Staff will assist voucher holders with disabilities in locating accessible units through working with community partners such as Disability Advocates, Community Rebuilders and other non-profit housing providers. The Housing Commission will provide reasonable accommodations, upon request, so that persons with disabilities may fully access and utilize the housing program and related services.

The Housing Commission informs participant families at the time of orientation to request any additional assistance they may need to identify accessible housing resources. Families will be referred to Disability Advocates who can work with individuals to seek accommodation to existing housing units to the extent required by law. Disability Advocates has links with local housing providers with accessible units.

vii. Assistance with Locating Suitable Housing

The Housing Commission helps voucher holders find suitable housing through educating voucher holders at their orientation about how to locate a unit and providing listings as needed from the Michigan Housing Locator. Because housing selection is a personal decision, the Kent County Housing Commission seeks to give voucher holders the tools they need to find a decent, safe, and sanitary unit by educating voucher holders about lead-based paint, housing quality inspection standards, and their civil rights as tenants.

In addition, the Kent County Housing Commission has ties with various community service providers and shares resources with voucher holders in order to support their needs. Voucher holders are also encouraged to work with a Family Self Sufficiency caseworker to connect to resources in the community and develop a plan for their family.

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Minority voucher holders are encouraged to seek housing in non-traditional residential areas through the annual recertification process. Information is provided on options available.

Additional assistance with the search process is provided to Voucher holders via:

1. Calling to confirm availability of units in non-traditional neighborhoods on an as-needed basis.
2. Helping with transportation costs or providing transportation services for those interested in housing in nontraditional neighborhoods depending on the circumstances and on an as-needed basis.
3. Providing a printout from the Michigan Housing Locator providing names, addresses, and other data on multifamily developments in a metropolitan or other regional area that makes units available to Section 8 participants. The Michigan Housing Locator has accessibility as a selection criterion.
4. Providing clear information to all participants, at their orientation session, concerning their housing rights and the steps they should take if they believe they have encountered housing discrimination during their housing search.

viii. Assistance to Mobility Impaired Individuals

The Housing Commission informs participant families at the time of orientation to request any additional assistance they may need to identify accessible housing resources.

Not limited to Section 8 participant families, Kent County contracts with Disability Advocates of Kent County (DAKC) through the Community Development Block Grant program to provide various services to promote accessible housing. DAKC is contracted to provide:

- 22 property inspections for either homeowners or renters who need a modification to their home
- At least 12 owner/landlord quarterly consultations including but not limited to written recommendations, surveys on accessible housing shortages, training on codes/ADA standards.
- DAKC maintains and distributes an inventory list of available barrier free and or subsidized units in Kent County. They also have a Rental Property Owners list. Accessibility options are offered with these lists.
- DAKC is contracted to provide at least 175 units of information and referral services to individuals and organizations on barrier-free

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requirements. And other housing issues related to persons with disabilities.

- DAKC provides a minimum of 5 community outreach presentations to community organizations.
- They also work with the housing authority to identify additional low-income barrier free housing.

ix. *Privately-Owned Housing Considerations*

Kent County Housing and Community Development uses Community Development Block Grant funds to address privately-owned housing as mentioned above. Disability Advocates of Kent County (DAKC) works with property owners and residents to obtain resources, first by checking with the Kent County CDBG-funded Access Modifications Program at Home Repair Services. DAKC will assist residents with the application process to Home Repair Services for their Access Modifications Program and seek other resources as needed.

The Housing Commission Chairperson is actively involved in the disability community and serves on various boards in the community. This creates a stream of communication with the Housing Commission about the needs of local residents and the efforts of the Kent County Housing Commission and Community Development Department and where additional gaps in services may exist.

x. *Fair Market Rent and Access of Disabled to Private Sector Units*

The Housing Commission has implemented policies and procedures for assuring that fair market rents are adjusted, to the extent permitted by law, to allow persons with disabilities to rent accessible private sector units. For example, the Commission works with persons who need accommodations to obtain an additional bedroom for a caretaker.

Fair Housing Strategies:

- Provide support to the County Housing Commission in their desegregation efforts.
- Facilitate greater distribution of Housing Choice voucher unit selection to out-county areas.
- Encourage and facilitate scattered site, low density housing as a means of deconcentrating racially impacted housing and communities.
- Explore the incorporation of universal design elements into the County's HOME program.

Analysis of Impediments to Fair Housing Choice
Kent County, Michigan

IV. Identification of Impediments of Fair Housing Choice

A. Public Sector

7. Sale of Subsidized Housing and Possible Displacement

If displacement occurs due to a Kent County development project, then Kent County shall provide relocation assistance to displaced persons in accordance with the federal Uniform Relocation Assistance and Real Property Policies Act of 1970, as amended. In all other instances, the County ensures all parties are following the requirements of the Federal Act.

8. Property Tax Policies

According to State Tax Commission, Bulletin 7 of 2010, pursuant to MCL 211.7u(2)(e), local assessors are required to adopt guidelines that set income level for their poverty exemption guidelines and those income levels shall not be set lower by a city or township than the federal poverty guidelines updated annually by the US Department of Health and Human Services.

The following table displays the federal poverty guidelines for use in setting poverty exemption guidelines for the 2010 assessments:

Table 13: 2010 Federal Poverty Income Guidelines

2010 Federal Poverty Income Guidelines	
Number of Persons Residing in the Principal Residence	Maximum Total Income
1	\$10,800
2	\$14,600
3	\$18,300
4	\$22,100
5	\$25,800
6	\$29,500
7	\$33,300
8	\$37,000
Each Additional Person	\$3,700

The maximum income threshold for poverty exemptions in every Kent County community evaluated are set equal to, as opposed to higher than the above minimum federal guidelines.

Each local assessor can also choose to limit poverty exemptions to partial exemptions (only part of the taxable value of the property) or to minimum or maximum exemptions of their choosing. Of the communities evaluated, 50% indicated that they provided full exemptions, and 50% stated that they only provided partial poverty exemptions.

Fair Housing Strategies:

- Recommend that the County consider broadening property tax relief provisions as a means of preserving lower-income homeownership opportunities, especially if such provisions would be beneficial to minority households, elderly households, or households with one or more members who are disabled.

IV. Identification of Impediments of Fair Housing Choice

A. Public Sector

9. Planning and Zoning Boards

Promoting diversity in representation of citizens on Kent County communities' Boards and Commissions, including lower-income racial and ethnic groups, gender categories, persons with disabilities, and families with children should be a basic element of the County's efforts to affirmatively further fair housing.

i. Planning Commission.

The Planning Commissions of most communities evaluated consist of between 7 and 10 members. With the exception of Rockford, which has 9 minority Planning Commission members, all other jurisdictions evaluated had between 0 and 2 minority members. It is important to note that none of the townships evaluated had any minority representation on their Planning Commission. Although minority composition is low in most Kent County communities, this is likely due in large part to the low percentage of non-white population in the communities' as a whole.

In terms of age composition, a large percentage (greater than 85%) of evaluated communities contained at least one individual older than 65, while 55% of evaluated communities contained at least one individual younger than 40. In terms of disability status, one-third of surveyed jurisdictions contained at least one disabled Planning Commission member. The gender makeup of the Planning Commissions in Kent County communities is not known.

Planning Commission meetings are held on various recurring days on a monthly basis, with most taking place at 7:00 PM in the evening.

ii. Zoning Board of Appeals.

The Zoning Board of Appeals (ZBA) of most communities evaluated consists of between 5 and 9 members. Unlike Planning Commission representation, there is much less racial diversity on Zoning Board of Appeals within the evaluated communities. Less than 25% of evaluated communities have any non-white ZBA members, with 2 out of 7 members in Kentwood being the highest minority representation followed by 1 of 7 members in Cedar Springs. Again, the townships evaluated have no non-white members. As noted previously, this is likely due to low non-white populations in Kent County townships.

In terms of age composition, all but one evaluated community has at least one individual older than 65, with a relatively equal representation between old (>65) and young (<40) individuals. In terms of disability status, only 11% of surveyed jurisdictions contained a disabled ZBA member. The gender makeup of the ZBAs in Kent County communities is not known.

IV. Identification of Impediments of Fair Housing Choice

Public Sector

Fair Housing Strategy:

- The County should encourage communities to pay close attention to the diversity in representation of citizens in the community, including lower-income racial and ethnic groups, gender categories, persons with disabilities, and families with children, on the Kent County communities' boards and commissions.

IV. Identification of Impediments of Fair Housing Choice

A. Public Sector

10. Building Codes (Accessibility)

The Building Departments in Kent County communities work to identify substandard housing conditions that could be hazardous to health and safety through code enforcement activities. The following information was summarized following phone interviews with various communities' in-house or contracted Building Inspection personnel:

i. Applicable Codes.

Most Kent County communities adhere to the 2006 Michigan Building Code (which will be changing to the 2009 code as of March 9, 2011), 2006 or 2009 Michigan Mechanical and Plumbing Codes, 2008 National Electrical Code in conjunction with the 2006 Michigan Residential Code, and 2006 International Property Maintenance Code (where applicable). Most communities have modified the model Property Maintenance Code to account for local weather conditions.

ADA Accessibility. The State Building Code includes a Barrier Free Code that mirrors provisions from the Americans with Disabilities Act (ADA) and requires that all new construction of multifamily units include units that are easily convertible to accessible units for persons with disabilities. In addition, all buildings open to public use must be accessible. All Kent County communities follow Barrier Free Code Guidelines for all new or altered construction projects within their jurisdiction. The Barrier Free Design Manual requires that a certain percentage of units be accessible and contain roll-in shower facilities depending upon the total number of units developed.

Access for Inspection Purposes. In general, Kent County community building inspectors receive very good cooperation in terms of gaining access for inspection or complaint follow up purposes. Many communities have adopted significant fines that help deter property owners from resisting entrance for inspection purposes.

Rental Registration. Several Kent County municipalities already require rental registration and complete inspection of rental properties every two years. Some communities permit provision of certificates of compliance for up to 4 years, based on the discretion of the inspector and depending upon the degree of maintenance and upkeep of a specific property. In addition to rental registration, contractor registration is also required in some municipalities.

Rental registration is not currently practiced in evaluated Kent County townships. None of the existing rental registration programs throughout the County include landlord training as part of the registration process.

IV. Identification of Impediments of Fair Housing Choice

Public Sector

Proponents of rental registration assert that by requiring that landlords be registered and also register their rental properties, communities can require that the landlords receive proper training on fair housing requirements. This can also provide an opportunity to inspect the property for building or property maintenance code violations. This list can also be an effective aid to assist persons searching for available and eligible affordable properties when seeking a place to live.

Nature of Inspections. Where rental registration is required, interior and exterior inspections are completed.

Fair Housing Strategies:

- Explore the implications of the establishment of rental registration and inspection programs in Kent County communities.
- Explore the possibility of requiring fair housing education as requirement for rental property registration
- When housing complaints are received, complete interior and exterior inspections for all rental properties, regardless of the nature of the complaint.
- Advocate for building ordinance updates, which provide for more inclusive development of housing for lower-income people and families, including persons with disabilities.

IV. Identification of Impediments of Fair Housing Choice

B. Private Sector

B. Private Sector

Government policies and procedures that regulate, monitor, or otherwise impact rental, sales, and property insurance practices can play a significant role in promoting fair housing choice. The County should work with fair housing entities to determine what, if any, changes might be made to strengthen their role where private sector practices appear to discriminate or otherwise contribute to restricting housing choice.

A HUD Office of Policy Development and Research Publication titled "*All Other Things Being Equal*" (a 2002 study of mortgage lending practices in two major US housing markets) demonstrated "that in both Los Angeles and Chicago, African American and Hispanic homebuyers face a significant risk of experiencing less favorable treatment than comparable whites when they visit mortgage lending institutions to inquire about financing options. In the majority of cases, minorities and whites received equal treatment, or when differences occurred, they were equally likely to favor the minority as the white. Still, in both metropolitan areas, paired testing revealed statistically significant patterns of unequal treatment that systematically favor whites."

Several other studies, the results of which are summarized in The Urban Institute's "*Mortgage Lending Discrimination: A Review of Existing Evidence*," provide evidence that minority homebuyers in the United States face discrimination from mortgage lending institutions. Although many of the existing studies have been undertaken in markets much larger than Kent County, the results support the general need for continued and expanded fair lending enforcement testing of private sector mortgage lending institutions. Furthermore, these studies show the need for affirmative action by lenders themselves to evaluate their policies and practices and change the manner in which judgments are made by every person who plays a role in lending process.

1. Fair Housing Practices Questionnaire

A list of fair housing-related questions that surveyed existing operations and actions being taken to ensure that fair housing practices were being applied by the private sector was distributed to several local financial institutions. The lists were distributed electronically to individuals as recommended by the County's Community Development Department.

Prior to distribution of the list of questions, phone contact was made to explain the purpose for the questions and the need for detailed responses. Recipients were given sufficient time to respond and a deadline for providing requested information. Unfortunately, only one response was received from the private sector after several attempts were made to follow up via e-mail and phone contact. Below is a summary of comments provided by the private sector. Responses to each question below are shown in italics:

IV. Identification of Impediments of Fair Housing Choice

Private Sector

- 1) Do lenders examine their conventional mortgage and home improvement loan profiles to determine whether there are neighborhoods that are underrepresented or not represented in these profiles? Furthermore, do lenders use the population and housing characteristics data that is available from the Federal financial regulatory agencies and their own Home Mortgage Disclosure Act (HMDA) data to determine whether there are neighborhoods that are underrepresented or not represented in these profiles?

Home improvement lending is a small proportion of HMDA info, so it is not focused on. It has gone from a significant product to not being a significant product as a result of the tightening of credit availability.

Do no separate conventional from government lending. Regardless of how the lending is being done, it is proliferating into low income areas.

Monthly reviews are completed regarding spatial distribution of loans throughout low/moderate income and racially concentrated areas. The comparisons are completed from both the lender and examiner side of the loan process.

- 2) Do lenders compare the home improvement loan profile to the mortgage loan profile to determine if the former, which is usually a short-term consumer loan, is made more frequently to minorities in minority neighborhoods and to homeowners in mixed neighborhoods than mortgage loans?

Not applicable because of the low number of home improvement loan applications received. In general, the applications are well distributed across all tract types. There is a reasonable distribution when compared to other lending.

- 3) Are any lending institutions aggressively marketing the availability of mortgage and home improvement loans in minority neighborhoods and encouraging minorities to apply?

"Aggressively marketing" is a relative term and difficult to determine. We consider all marketing and advertising and try to ensure that such material is reflective of communities being marketed to. A flyer in one branch looks different than another, depending on the demographics of the area.

- 4) Do lending institutions that market loans to minorities provide such loans in all areas of the community, or only in minority neighborhoods?

Products are available everywhere, conventional and government. Whatever gets the loan done, regardless of applicant type is what is utilized. A needs assessment is done for every loan applicant to determine what the best product for the customer. Banks look at the big picture and try to make it happen.

- 5) Are loans aggressively marketed to women and persons with disabilities?

Woman and persons with disabilities are not demographic segments that are specifically targeted.

IV. Identification of Impediments of Fair Housing Choice

B. Private Sector

Other comments provided by private sector:

Match pair analysis is employed, whereby banks review denied loans to a protected class, against the same loan that was approved. The process encourages a review of ongoing lending process. Examiners look beyond HMDA and do a robust review.

Overall, in distressed markets, 20-30% PMI is required. Is this a state-wide or community-wide trend? Requiring 20% down payment in one place and 30% in another place. This is an industry-wide practice that is occurring all throughout the country.

Fair Housing Strategies.

The County should coordinate with fair housing entities to initiate or continue the following fair housing practices as it relates to the private sector:

- Continue to support the Fair Housing Center as they provide outreach and training to local lenders.
- Perform periodic (quarterly) examinations of sales and rental practices including real estate broker and financial institution practices, through formal surveys and informal means.
- Encourage adoption and dissemination of anti-redlining or anti-blockbusting policies.
- Continue to support and improve a strong public education effort regarding the protection under fair housing laws, or other actions. Identify areas of where existing outreach can be supplemented and new forms of media can be explored to increase the efficiency of such outreach. Sponsor training to loan officers, other lending personnel, appraisers, and private insurance staff in how to apply HUD's Fair Housing policies and standards.
- Explore the Fair Housing Center's ability to develop performance measures or other testing mechanisms to gauge private sector understanding and application of Fair Housing laws and practices.
- Encourage lenders to perform self-evaluations of their conventional mortgage and home improvement loan profiles to determine whether there are neighborhoods that are underrepresented or not represented in these profiles.
- Encourage lending institutions to market the availability of mortgage and home improvement loans in minority neighborhoods and encourage minorities to apply.

IV. Identification of Impediments of Fair Housing Choice

Private Sector

- Support the FHCWM's role in facilitating communication between local banks, financial institutions, mortgage companies, realtors, and appraisers to identify problems and provide solutions that promote fair housing at their annual Fair Housing workshop.

IV. Identification of Impediments of Fair Housing Choice

C. Public and Private Sector

C. Public and Private Sector

1. Fair Housing Enforcement

Effective fair housing enforcement lies at the heart of a comprehensive program to affirmatively further fair housing.

To assure good standing for HUD's Community Planning and Development (CPD) programs, the County should address any and all concerns expressed by HUD in contract conditions that relate to fair housing and equal opportunity performance as required by the laws and regulations governing these programs. These concerns include any and all court decisions relating to fair housing and other civil rights laws to which the County or Housing Commission is subject.

County staff has verified that HUD has not issued any court decisions related to fair housing in Kent County.

i. Fair Housing Center of West Michigan

The following is a summary of fair housing enforcement-related information provided by Nancy Haynes, Executive Director of the Fair Housing Center of West Michigan (FHCWM), and the contracted fair housing provider for Kent County.

The County's fair housing enforcement program, as administered by the FHCWM, consists of housing practices testing and complaint assistance. In terms of testing, according to FHCWM annual performance reports, a minimum number of annual housing tests are completed "based upon complaints from bona fide home seekers, or survey assignments as supported by local advertising." Survey testing is completed at sites where testing formerly yielded evidence of housing discrimination. All tests are completed by trained testers in accordance with generally accepted testing methodologies and are designed to detect measurable differences in the treatment of testers. The presence of discrimination is determined using paired testing methodology. Paired testing compares how two individuals with similar credentials (assets, credit scores, loan to value ratio) but of different race and/or ethnicity are treated by various housing-related entities (i.e. appraisers, mortgage lenders, loan originators, etc...).

In terms of complaint assistance, the FHCWM receives, reviews, and processes fair housing related complaints or questions. In addition, records are kept regarding the number, source and results of any complaints received from Kent County Housing Commission Section 8 voucher holders. Where evidence of discrimination is found, the FHCWM assists the party through resolution or initiates a complaint on behalf of said party.

The County's enforcement program conforms to HUD requirements and, although demand outweighs funding, the program is considered efficient and effective at processing and settling fair housing complaints.

IV. Identification of Impediments of Fair Housing Choice

Public and Private Sector

As noted above, the County requires annual performance reports from the FHCWM regarding fair housing complaints (refer to Table 9: Summary of Fair Housing Activities, 2005-2010) and uses such reports to plan for future use of CDBG and HOME funds for fair housing activities. With additional funding, the fair housing center would increase the number of paired tests completed annually and conduct additional marketing and training.

ii. Michigan Civil Rights Commission and Department of Civil Rights.

Under Michigan law, all citizens are guaranteed protection against discrimination in housing accommodation, giving all persons, without regard to race, color, religion, age, sex, national origin/ancestry, disability, genetic information, height, weight, arrest record, or familial status, the right to live wherever they can afford to buy a home or rent an apartment. MDCR is the state agency that enforces anti-discrimination laws and the Fair Housing Act.

Any person who feels they have been discriminated against under the Fair Housing Act and/or Michigan Fair Housing Law may file a complaint with MDCR. MDCR is equipped to take complaints in person, by telephone, by US mail or by e-mail at their regional office in Grand Rapids. If the MDCR determines that the complaint is timely (alleged discrimination has occurred within the past 180 days) and under the MDCR jurisdiction then a formal written complaint is prepared and notarized. MDCR staff provides assistance in drafting and filing complaints. After complaints are filed, they are investigated by MDCR on both the part of the complainant and the respondent. The respondent has a minimum of 14 days to answer the complaint, agree to mediation (if appropriate) or proposed resolution. Some cases are sent with a department order requesting response within 28 days. The MDCR contacts HUD and the complaint is duly filed with HUD if it is determined that HUD has jurisdiction. Even if HUD has jurisdiction, the MDCR processes the complaint.

Formal mediation does not apply to housing complaints processed by the MDCR due to HUD guidelines and timeframes associated with completion of investigations. However, throughout the course of the investigation, the MDCR attempts to resolve the complaint. If the complaint cannot be resolved, the complaint proceeds through the investigative process and formal charge is made and a date set for a public hearing. The hearing is conducted by one or more Civil Rights Commissioners, or by a hearing referee. After the hearing, the MDCR either issues an order directing that remedial action be taken to cease discriminatory practice or dismisses the case. If necessary, the MDCR may ask the circuit court to enforce an order. Appeal for judicial review in the circuit court is available to a complainant or respondent who is not satisfied with the Michigan Civil Rights Commissions' final order. MDCR investigations are normally completed within 100 days.

IV. Identification of Impediments of Fair Housing Choice

C. Public and Private Sector

The Michigan Department of Civil Rights, Grand Rapids Regional Office, can be reached at:

Grand Rapids Office
350 Ottawa Ave., N.W.
3rd Floor
Grand Rapids, MI 49503
Phone: (616) 356-0380
Fax: (616) 356-0399
TTY: (877)878-8464
Toll Free: (800)482-3604

iii. HUD Office of Fair Housing and Equal Opportunity.

The mission of the HUD Office of Fair Housing and Equal Opportunity is to enforce the Fair Housing Act and other civil rights laws. HUD and MDCR jointly work in carrying out investigative and enforcement functions. If a right to fair housing is being violated, a complaint can be submitted to the nearest HUD office in Chicago, IL. HUD's Chicago office is responsible for fair housing oversight in the Midwest region, including Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin.

Complaints based upon alleged violations of fair housing law are filed directly with HUD in Denver or brought to HUD's attention by MDCR. HUD's Chicago office then investigates the allegations.

HUD's Chicago office can be reached at:

U.S. Department of Housing and Urban Development
Ralph H. Metcalfe Federal Building
77 West Jackson Boulevard, Room 2101
Chicago, Illinois 60604-3507
Phone: (312) 353-7776 or 1-800-765-9372
Fax: (312) 886-2837
TTY: (312) 353-7143

IV. Identification of Impediments of Fair Housing Choice

Public and Private Sector

2. Informational Programs

Fair housing planning should include dissemination of information to the general public, government and other community officials and leaders about actions constituting discriminatory behavior, fair housing laws, and fair housing objectives.

As noted previously, the FHCWM is the entity that provides fair housing information programs on behalf of the County. The following is a summary of information program-related elements according to annual FHCWM annual performance reports.

The County's fair housing information program consists of visual surveys of fair housing materials, and active dissemination of fair housing information. Visual surveys of housing and lending sites are completed to determine compliance with required posting of fair housing information. Fair housing related information is disseminated throughout the sales, rental, lending, and advertising areas of the housing industry. Information is provided to home seekers and the housing industry through public service access channels, rental complexes, real estate offices, lenders, and community and education facilities throughout the County. Information program activities are undertaken throughout the year. Refer to Table 9: Summary of Fair Housing Activities for a summary of information program-related activities undertaken by the FHCWM.

In addition, to further the progress already made toward reversing negative perceptions associated with affordable housing, the County in cooperation with local fair housing entities, should work with communities and organizations to further educate the public, thereby serving to remove the stigma associated with affordable housing and promote integration and diversity of all types of housing. At the same time, the County and Housing Commission should collaborate with public and/or private entities to facilitate development and maintenance of quality housing that is integrated into the existing housing stock in terms of scale, density, and historic character.

Furthermore, as funding comes available, the FHCWM and Housing Commission should continue to further expand its public information and education activities to highlight affordable housing accomplishments in the County, and to publicize research on the positive impact of affordable housing.

Fair Housing Strategies:

The County should work to accomplish the following:

- Regularly assess the effectiveness of information program activities in informing people of their rights and responsibilities and in reducing the kinds of prejudices and intolerance that lead to discriminatory actions.

IV. Identification of Impediments of Fair Housing Choice

C. Public and Private Sector

- Develop new outreach, education, or information programs and activities to promote housing opportunities for particular segments of the community (such as racial or ethnic minority groups or persons with disabilities low or moderate income individuals, and renters). Enable victims of discrimination to come forward with complaints through increased outreach and education of fair housing rights.
- Where possible support efforts to secure additional grant funding to increase the number of paired tests performed by the Fair Housing Center
- Test housing applicants to evaluate the effectiveness of current outreach activities.
- Broaden the scope of outreach efforts and identify new outlets for fair housing-related materials in subsidized housing facilities throughout the County.
- Educate County staff, elected officials, community leaders and others having duties that impact fair housing about fair housing laws and objectives.

IV. Identification of Impediments of Fair Housing Choice

Public and Private Sector

3. Visitability in Housing

“Visitability” means that: (1) at least one entrance is at grade (no step), approached by an accessible route, such as a sidewalk and (2) the entrance door and all interior doors on the first floor are at least 34 inches wide, offering 32 inches of clear passage space.

Visitability allows mobility impaired residents to visit families and friends where this would not otherwise be possible. A visitable home also serves persons without disabilities (e.g. a mother pushing a stroller, a person delivering large appliances, a person using a walker, etc.). One difference between “visitability” and “accessibility” is that accessibility requires that all features of a dwelling unit be made accessible for mobility impaired persons. A visitable home provides less accessibility than an accessible home, and is meant to be designated for only those units not required to be accessible.

According to input provided by County staff, the County recognizes the merits of visitable design to meet the needs of persons with a wide range of age and physical abilities and to facilitate “aging in place”. While the County has not formally adopted a policy to require visitability standards in new or rehabilitated renter or owner units funded with HOME or CDBG funds, the County will be looking at incorporating visitability standards in its programs in the coming months.

4. Determination of Unlawful Segregation

Where there is a determination of unlawful segregation or other housing discrimination by a court, or a finding of noncompliance by HUD under Title VI of the Civil Rights Act of 1964 or Section 504 of the Rehabilitation Act of 1973, or where the Secretary has issued a charge under the Fair Housing Act regarding assisted housing within a recipient’s jurisdiction, an analysis should be performed of the actions which could be taken by the recipient to help remedy the discriminatory condition, including actions involving the expenditure of funds by the jurisdiction.

To the best knowledge of the analysis preparers, there has been no determination of unlawful segregation or other housing discrimination in Kent County.

V. Assessment of Current Public and Private Fair Housing Programs and Activities

A. CRA Compliance

V. Assessment of Current Public and Private Fair Housing Programs and Activities

Effective fair housing enforcement lies at the heart of a comprehensive program to affirmatively further fair housing.

A. CRA Compliance

Passed by Congress in 1977, the Community Reinvestment Act (CRA) states that “regulated financial institutions have continuing and affirmative obligations to help meet the credit needs of the local communities in which they are chartered.” The act then establishes a regulatory regime for monitoring the level of lending, investments, and services in low- and moderate-income neighborhoods. According to the National Community Reinvestment Coalition:

“Approximately once every two years examiners from four federal agencies assess and ‘grade’ lending institutions activities in low- and moderate-income neighborhoods. If a regulatory agency finds that a lending institution is not serving these neighborhoods, it can delay or deny that institution’s request to merge with another lender or to open a branch or expand any of its other services. The financial institution regulatory agency can also approve the merger application subject to specific movements in a bank’s lending or investment record in low and moderate-income neighborhoods.”

While denials of bank applications are rare, federal agencies can make approvals conditional upon specific improvements in a bank’s CRA performance. Also, dialogue between banks and community organizations often result in bank commitments to increase lending and/or start affordable housing and small business lending programs.

The CRA requires that financial institutions progressively seek to enhance community development within the area they serve. On a regular basis, financial institutions submit information about mortgage loan applications as well as materials documenting their community development activity. The records are reviewed to determine if the institution satisfied CRA requirements. The assessment includes a review of records as related to the following:

- Commitment to evaluating and servicing community credit needs;
- Offering and marketing various credit programs;
- Record of opening and closing offices;
- Discrimination and other illegal credit practices; and

- Community development initiatives

The data is evaluated and a rating for each institution is determined. Ratings for institutions range from substantial noncompliance in meeting credit needs to an outstanding record of meeting community needs. The table [below](#) summarizes the most recent CRA compliance rating for 21 financial institutions whose physical headquarters are located in Kent County communities (including Grand Rapids).

Table 14: Most Recent CRA Rating of Examined Banks in Kent County

Rating	Examined Banks	
	Number	Percent
Outstanding	4	19%
Satisfactory	17	81%
Needs to Improve	0	0%
Substantial Noncompliance	0	0%
Source: FFIEC Interagency CRA Ratings, 2010		

All institutions examined in Kent County currently have a rating of satisfactory or higher. This compares well with the national average, as does the fact that not a single financial institution reviewed in Kent County was found to currently need improvement or was substantially noncompliant with the CRA. In the past some financial institutions were listed as needing improvement, but have since shown improvement to where their most recent testing indicated at least a satisfactory rating.

B. HMDA Data Analysis

HMDA data consists of information about mortgage loan applications for financial institutions, savings and loans, savings banks, credit unions and some mortgage companies. The data contains information about the location, dollar amount, and types of loans made, as well as racial and ethnic information, income, and credit characteristics of all loan applicants. The data are available for government loans, home purchases, loan refinances, and home improvement loans.

HMDA data can provide a picture of how different applicant types fare in the mortgage lending process. These data can be used to identify areas of potential concern that may warrant further investigations. For example, by comparing loan approval rates of minority applicants with nonminority's that have similar income and credit characteristics, areas of potential discrimination may be detected. HMDA was also enacted by Congress to provide investors and public agencies with information to guide investments in housing. Likewise, HMDA analysis can be used to forge partnerships among banks and community organizations in underserved minority or low-income neighborhoods.

V. Assessment of Current Public and Private Fair Housing Programs and Activities

B. HMDA Data Analysis

The Federal Reserve is the primary regulator of compliance with fair lending regulations. When federal regulators examine financial institutions, they use HMDA data to determine if applicants of a certain gender, race, or ethnicity are rejected at statistically significant higher rates than applicants with other characteristics. The Federal Reserve uses a combination of statistical modeling and loan file sampling and review to detect lending discrimination.

1. Applications Received by Loan Type and Disposition by Race and Ethnicity.

The HMDA data tables in this section present 2006 and 2009 summary HMDA data for the Grand Rapids-Wyoming Metropolitan Statistical Areas/Metropolitan Divisions (MSA/MD) by loan application status (i.e. originated/denied/withdrawn), application type, and disposition by race and ethnicity.

Table 15: Grand Rapids-Wyoming, MI MSA/MD Loan Applications Received, by Loan Type; 2006, 2009

	Government Guaranteed Home Purchase		Conventional Home Purchase		Refinance		Home Improvement	
	2006	2009	2006	2009	2006	2009	2006	2009
Loans originated	977	3,385	13,167	3,330	15,794	16,904	3,184	843
Apps. approved, but not accepted	64	221	1,824	224	3,435	1,429	360	68
Denied	198	704	3,448	629	10,929	5,170	2,004	593
Withdrawn	124	501	1,713	466	5,830	3,841	401	124
Determined incomplete	52	91	416	109	2,089	867	112	55
Loans on 1-4 Family and Manufactured Home Dwellings, FFIEC HMDA Aggregate Reports, 2006, 2009								

V.Assessment of Current Public and Private Fair Housing Programs and Activities

HMDA Data Analysis

Table 16: Disposition of Applications for FHA, FSA/RHS and VA Home Purchase Loans by Race and Ethnicity, Grand Rapids-Wyoming, MI MSA/MD; 2006, 2009

Race	Apps. Received		Apps. Denied		Percent Denied		Ethnicity	Apps. Received		Apps. Denied		Percent Denied	
	2006	2009	2006	2009	2006	2009		2006	2009	2006	2009	2006	2009
American Indian/Alaskan Native	6	6	3	0	50%	0%	Hispanic or Latino	183	280	32	61	17%	22%
Asian	10	47	2	7	20%	15%	Not Hispanic or Latino	1,134	4,272	151	576	13%	13%
Black or African American	86	154	17	23	20%	15%	Joint (Hispanic/ Latino & Not Hispanic or Latino)	15	43	4	5	27%	12%
Native Hawaiian/ Other Pacific Islander	2	2	0	1	0%	50%	Ethnicity Not Available	83	307	11	62	13%	20%
White	1,214	4,325	167	599	14%	14%							
2 or More Minority Races	0	2	0	1	0%	50%							
Joint (White/Minority Race)	15	39	2	6	13%	15%							
Race Not Available	82	327	7	67	9%	20%							
FFIEC HMDA Aggregate Reports, 2006, 2009													

V. Assessment of Current Public and Private Fair Housing Programs and Activities

B. HMDA Data Analysis

Table 17: Disposition of Applications for Conventional Home-Purchase Loans by Race and Ethnicity, Grand Rapids-Wyoming, MI MSA/MD; 2006, 2009

Race	Apps. Received		Apps. Denied		Percent Denied		Ethnicity	Apps. Received		Apps. Denied		Percent Denied	
	2006	2009	2006	2009	2006	2009		2006	2009	2006	2009	2006	2009
American Indian/Alaskan Native	99	6	30	3	30%	50%	Hispanic or Latino	1,278	122	319	41	25%	34%
Asian	343	123	44	13	13%	11%	Not Hispanic or Latino	1,7283	4,255	2,677	532	15%	13%
Black or African American	1,514	69	496	17	33%	25%	Joint (Hispanic/Latino/Not Hispanic or Latino)	144	31	10	3	7%	10%
Native Hawaiian/Other Pacific Islander	33	6	12	1	36%	17%	Ethnicity Not Available	1,863	350	442	53	24%	15%
White	16,528	4,142	2,406	525	15%	13%							
2 or More Minority Races	7	1	1	0	14%	0%							
Joint (White/Minority Race)	150	56	17	15	11%	27%							
Race Not Available	1,894	355	442	55	23%	15%							
FFIEC HMDA Aggregate Reports, 2006, 2009													

V.Assessment of Current Public and Private Fair Housing Programs and Activities

HMDA Data Analysis

Table 18: Disposition of Applications on Refinance Loans by Race and Ethnicity, Grand Rapids-Wyoming, MI MSA/MD; 2006, 2009

Race	Apps. Received		Apps. Denied		Percent Denied		Ethnicity	Apps. Rec'd		Apps. Denied		Percent Denied	
	2006	2009	2006	2009	2006	2009		2006	2009	2006	2009	2006	2009
American Indian/Alaskan Native	193	76	80	30	41%	39%	Hispanic or Latino	1,737	486	660	157	38%	32%
Asian	312	309	91	65	29%	21%	Not Hispanic or Latino	30,123	24,654	8,154	4,225	27%	17%
Black or African American	2,342	485	884	146	38%	30%	Joint (Hispanic/Latino & Not Hispanic or Latino)	234	222	72	46	31%	21%
Native Hawaiian/Other Pacific Islander	75	31	30	6	40%	19%	Ethnicity Not Available	5,983	2,849	2,043	742	34%	26%
White	28,496	24,186	7,526	4,138	26%	17%							
2 or More Minority Races	16	9	13	2	81%	22%							
Joint (White/Minority Race)	281	234	87	37	31%	16%							
Race Not Available	6,362	2,881	2,218	746	35%	26%							
FFIEC HMDA Aggregate Reports, 2006, 2009													

V. Assessment of Current Public and Private Fair Housing Programs and Activities

B. HMDA Data Analysis

Table 19: Disposition of Applications for Home Improvement Loans by Race and Ethnicity, Grand Rapids-Wyoming, MI MSA/MD; 2006, 2009

Race	Apps. Received		Apps. Denied		Percentage Denied		Ethnicity	Apps. Received		Apps. Denied		Percentage Denied	
	2006	2009	2006	2009	2006	2009		2006	2009	2006	2009	2006	2009
American Indian/Alaskan Native	33	7	15	6	45%	86%	Hispanic or Latino	333	54	188	36	56%	67%
Asian	37	15	19	5	51%	33%	Not Hispanic or Latino	4,731	1,350	1,402	425	30%	31%
Black or African American	415	45	239	28	58%	62%	Joint (Hispanic or Latino/Not Hispanic or Latino)	64	10	18	5	28%	50%
Native Hawaiian/Other Pacific Islander	14	2	6	0	43%	0%	Ethnicity Not Available	933	269	396	127	42%	47%
White	4,592	1,319	1,310	410	29%	31%							
2 or More Minority Races	4	2	2	1	50%	50%							
Joint (White/Minority Race)	59	16	21	6	36%	38%							
Race Not Available	907	277	392	137	43%	49%							
FFIEC HMDA Aggregate Reports, 2006, 2009													

V. Assessment of Current Public and Private Fair Housing Programs and Activities

HMDA Data Analysis

For government guaranteed home purchase loans, all minorities except for American Indian/Alaskan Native had higher denial rates than whites, but the 0% denial rate for American Indian/Alaskan Native population was likely due to the low number of applications (6 total applications in both 2006 and 2009) relative to other racial categories. A comparison of denial rates between the American Indian/Alaskan Native and the white population is not reasonable, reflective of discrimination, nor statistically significant. Amongst those races with at least 35 applications, the denial rate was nearly consistent with the denial rate for whites (14%) between all races. Ethnicity appeared to affect denial rates to some degree. In 2009, 22% of Hispanic applications were denied, compared to 13% for non-Hispanics. The same can be said in 2006 where 17% of Hispanic applications were denied compared to 13% for Non-Hispanics. The number of government guaranteed home purchase loan applications received was much greater in 2009 than in 2006. For those categories with a reasonable number of applications, a comparison of the percent denied from 2006 and 2009 was inconsistent, with the percentage denied showing an increase for two race categories (Joint and Race Not Available) and a decrease for two race categories (Asian and White). The same inconsistency is shown in denial rates for ethnicity where Hispanic denial rates rose from 17% in 2006 to 22% in 2009 and joint ethnicity applicant denial rates fell from 27% in 2006 to 12% in 2009.

For conventional loans, blacks (33% in 2006, 25% in 2009) and American Indian/Alaskan Native (30% in 2006 and 50% in 2009) had the highest denial rates. For comparison, only 13% of whites were denied for conventional mortgages in 2009, compared to 15% in 2006. In 2006, one quarter of Hispanics were denied for conventional loans compared to 15% of non-Hispanics. In 2009, one third of Hispanics (34%) were denied for conventional loans, compared to 13% of non-Hispanics. The number of conventional home loans was much greater in 2006 as compared to 2009.

As can be expected with the recent changes in the economy and tightening of credit availability, the number of home improvement loans was much greater in 2006 than 2009. During this time period, the denial rate for both black and white applicants rose. Minority applicants were denied more frequently (between 33-86%) than whites (31%) in 2009. African American denial rates were 58% in 2006 and 62% in 2009 compared to 29% in 2006 to 31% in 2009 for whites. Two-thirds of Hispanics (67%) and nearly one third of non-Hispanics (31%) were denied for loans in this category in 2009. The percentage of Hispanics denied increased from 56% in 2006 to 67% in 2009, while the percentage of non-Hispanics denied was 13% for both 2006 and 2009.

A better picture is provided by analysis of refinance loan denial rates during 2006 and 2009 because there are more applications for most racial and ethnic groups. Although there were many more refinance loan applications filed in 2006 than 2009, the percent denied decreased for all racial and ethnic groups. American

V. Assessment of Current Public and Private Fair Housing Programs and Activities

B. HMDA Data Analysis

Indians/Alaskan Natives (41% in 2006, 39% in 2009) and African Americans (38% in 2006, 30% in 2009) had the highest denial rates, while relatively lower denial rates were found in the Asian (29% in 2006, 21% in 2009) and White (26% in 2006, 17% in 2009) categories. Nearly one-third of Hispanics (38% in 2006, 32% in 2009) were denied for refinancing, while non-Hispanics were denied at lower rates at (27% in 2006, 17% in 2009).

2. Denial rates by race and income.

Tables [Table 20](#) and [Table 21](#) below present the percentage of mortgage loan applicants denied by race and ethnicity, categorized by income level and loan type for 2006 and 2009. The denial rate is provided for applicants earning less than 80% median family income (i.e. low/moderate income households). The denial rate for this income level is presented because it represents applicants seeking affordable housing. It is important to note that for all groups other than African American, White, and Asian, the number of loan applications (except for refinance loans) were relatively small. As such, caution should be used in interpreting data about racial and ethnic groups.

For government guaranteed home purchase loans, the percentage of applications denied for the African American, White, and Asian categories was consistently near 15% in 2009. The denial rates were slightly higher in 2006 with 25% for Asians, 23% for African Americans, and 16% for Whites. The denial rate for Hispanics rose from 18 to 23% between 2006 and 2009, but fell from 16 to 14% for non-Hispanics.

In terms of conventional home purchase loans, the denial rate increased from 2006 to 2009 for Asians (from 12 to 17%) and Hispanics (from 26 to 37%) and decreased for African Americans (from 37 to 23%) and slightly for Whites (from 19 to 18%).

In 2006 and 2009, the denial rate for refinance loans was notably higher for African Americans (41%), than for Asians and Whites. The denial rate decreased between 2006 and 2009 for Asians (from 34 to 23%) and Whites (from 31 to 22%). The denial rate remained constant at near 41% for Hispanics and decreased from 32 to 22% for Non-Hispanics.

V.Assessment of Current Public and Private Fair Housing Programs and Activities

HMDA Data Analysis

Table 20: Mortgage Loan Denial Rates- Home Purchases- by Race/Ethnicity and Income, Grand Rapids-Wyoming, MI MSA/MD; 2006, 2009

Government Guaranteed Home Purchases							Conventional Home Purchases					
Race/Ethnicity	Low Income Applicants (<50% of Median)		Moderate, Middle and Upper Income Applicants (50-79% of Median or Greater)		Denial Rate for Apps <80% of Median		Low Income Applicants (<50% of Median)		Moderate, Middle and Upper Income Applicants (50-79% of Median or Greater)		Denial Rate for Apps <80% of Median	
	2006	2009	2006	2009	2006	2009	2006	2009	2006	2009	2006	2009
American Indian/Alaskan Native	4	0	2	6	50%	0%	16	3	82	3	31%	75%
Asian	2	15	7	32	25%	11%	29	38	311	83	12%	17%
Black or African American	22	48	62	102	23%	16%	190	11	1284	58	37%	23%
Native Hawaiian/Other Pacific Islander	1	1	1	1	0%	100%	12	2	20	4	44%	25%
White	330	1,354	867	2,909	16%	15%	2,169	687	13,847	3,398	19%	18%
Hispanic or Latino	90	180	92	95	18%	23%	374	54	867	68	26%	37%
Not Hispanic or Latino	268	1,258	849	2,951	16%	14%	2,071	696	14,700	3,500	20%	17%
Joint (Hispanic or Latino/Not Hispanic or Latino)	2	2	13	41	29%	14%	2	3	138	28	19%	25%
FFIEC HMDA Aggregate Reports, 2006, 2009												

V. Assessment of Current Public and Private Fair Housing Programs and Activities

B. HMDA Data Analysis

Table 21: Mortgage Loan Denial Rates-Refinancing and Home Improvement Loans- by Race/Ethnicity and Income, Grand Rapids-Wyoming, MI MSA/MD; 2006, 2009

Race/Ethnicity	Refinances						Home Improvement Loans					
	Low Income Applicants (<50% of Median)		Moderate, Middle and Upper Income Applicants (50-79% of Median or Greater)		Denial Rate for Apps <80% of Median		Low Income Applicants (<50% of Median)		Moderate, Middle and Upper Income Applicants (50-79% of Median or Greater)		Denial Rate for Apps <80% of Median	
	2006	2009	2006	2009	2006	2009	2006	2009	2006	2009	2006	2009
American Indian/Alaskan Native	39	14	151	51	42%	55%	10	5	22	2	48%	86%
Asian	26	41	272	246	34%	23%	4	2	32	12	58%	38%
Black or African American	519	80	1,698	302	41%	41%	117	15	297	27	59%	57%
Native Hawaiian/Other Pacific Islander	15	12	57	16	43%	25%	6	1	8	1	38%	0%
White	3,434	2,317	23,932	19,473	31%	22%	764	270	3,785	1,020	37%	37%
Hispanic or Latino	542	126	1,134	265	41%	42%	119	23	209	31	60%	75%
Not Hispanic or Latino	3,605	2,361	25,347	19,816	32%	22%	789	273	3,902	1,043	38%	38%
Joint (Hispanic or Latino/Not Hispanic or Latino)	12	11	215	192	40%	24%	7	2	57	8	39%	50%
FFIEC HMDA Aggregate Reports, 2006, 2009												

The same discrepancy in denial rates between African Americans and other races was evident for home improvement loans as for refinance loans, where the denial rate was notably higher for African Americans (59% in 2006 and 57% in 2009), than for Asians and Whites. Denial rates for Asians fell from 58% in 2006 to 38% in 2009 and remained was 37% in both 2006 and 2009 for Whites. In terms of ethnicity, the most noteworthy discrepancy in the difference between Hispanics and Non-Hispanics can be seen in the Home Improvement Loans category where the denial rate for Hispanics rose from 60% in 2006 to 75 % in 2009. This is compared to a 38% denial rate in both years for Non-Hispanics.

Throughout all loan types though, the denial rate was higher for Hispanics than for Non-Hispanics.

A higher denial rate for minorities does not necessarily indicate fair housing problems. It can be explained, in part, by minorities often having lower incomes than non-minorities. It is also possible that credit histories vary among applicants with different racial/ethnic characteristics. Without a detailed analysis of each applicant (such data are unavailable in the HMDA records due to confidentiality), it is unclear if the reason for the difference is due to variables other than income that are considered in making the lending decision (e.g., credit history, debt to income ratios) or if discrimination in lending could be occurring.

Fair Housing Strategies:

- Offer first-time homebuyer classes and education program about loan requirements and budgeting to assist applicants in understanding how to improve their probability of receiving a mortgage loan.
- Provide credit counseling and education about good credit.
- Publicize the availability of government guaranteed loans to potential borrowers.
- Community groups and government officials should take an active role in encouraging increased CRA compliance activities by local financial institutions.
- Identify specific steps that will be taken to strengthen the fair housing aspect of community revitalization activities in poorer neighborhoods through equalizing services, revising displacement policies and procedures, initiating or strengthening agreements with banks and other lending institutions subject to CRA, creating job-housing and education-housing linkages in and outside neighborhoods.
- Collect data as required by HUD on County-assisted housing developments to ensure fair housing practice is being followed by County grantees.

VI. Conclusion

A. Recommendations and Action Items

VI. Conclusion

The following strategies and action items are recommended to address the specific Kent County barriers identified throughout the analysis. Several of the Action Items noted below could be implemented by partner fair housing entities, but should be done so following direct coordination with County staff:

A. Recommendations and Action Items

1. Continue to work with an organization or agency to provide fair housing services to the County.
 - a. The County has the opportunity through contracts with local partners and providers to address impediments to fair housing in Kent County based on needs identified in the prior year.
 - b. Based on the declining number of housing test cases in recent years, determine if additional funding is available and should be targeted to increase housing testing, realizing that fair housing regulations are only as good as the enforcement thereof.
 - c. Work with the agency or organization to include religion and age discrimination in information programming to ensure that discrimination is identified, not tolerated, and properly addressed regardless of type.
 - d. Work with partner agency or agencies to expand enforcement of fair housing choice into rural areas, where such issues often go unnoticed.

2. Research whether a Countywide Fair Housing Ordinance would be an effective tool to increase fair housing outcomes in Kent County.

Kent County does not currently have a Fair Housing Practices Ordinance. Although the County is already covered by Federal and State regulations regarding fair housing, providing locally based regulations allows for an additional layer of enforcement while also allowing the opportunity to add additional standards or customized regulations to the Federal requirements. Extensive pre-planning would be required to determine the potential impact of a Fair Housing Ordinance in the County and the legal and political process to enact such an ordinance given the number of local governmental units within the County. With an assessment of the steps and process required to pursue a fair housing ordinance, the County may decide to recommend this option. This assessment should evaluate the inclusion of elements that provide for tax policies, diversity amongst County communities' Commissions and Boards, and equal provision of services for all County residents in such an Ordinance.

i. Tax Policies

Tax forgiveness, delay, or other tax relief policies can help lower-income homeowners keep their homes. Programs of this kind can be part of an overall, much larger strategy to promote fair housing because they help to preserve homeownership opportunities for groups like minority families and elderly homeowners who otherwise would have only rental options.

Tax relief can take the form of delayed payments. Property taxes become, in effect, a lien on the property to be paid at the time of sale or inheritance. Alternatively, interest-free payments can be spread over months, permitting smaller monthly payments for those who qualify. The Kent County Treasurer should explore these various options and opportunities for implementation.

ii. Board and Commission Make Up

The County should pay close attention to the importance of the relationship between the membership of planning and zoning boards and the decisions they make regarding neighborhood revitalization activities and lower-income housing site selection. Promoting diversity in representation of citizens in the community, including lower-income racial and ethnic groups, gender categories, persons with disabilities, and families with children should be a basic element of the County's efforts to affirmatively further fair housing. A more conscious and dedicated effort to support representation of these groups on Kent County communities' boards and commissions is paramount.

iii. Equalization of Services

One aspect of fair housing choice is neighborhood revitalization and the provision of adequate public services to areas in which low and moderate income families live. African-Americans, Hispanics, other urban minorities and persons with disabilities who are most concentrated in such neighborhoods will benefit from better neighborhood environments critical to good housing. Quality public services and facilities that create a decent living environment include good schools, well maintained parks and recreational facilities & programs, social service programs, efficient public transportation, public safety, street lighting, and effective property maintenance and code enforcement. Lower income, densely populated residential areas often lack the level and array of services that are provided in more affluent neighborhoods. While many of these are services that are not directly provided by the County, the County should promote equalization of services within Kent County communities as part of FHP when making decisions on the expenditure of CDBG and other federal dollars.

VI. Conclusion

A. Recommendations and Action Items

Additional Action Items:

- a. Continue to seek ways to identify the linkages between fair housing choice and resident's access to quality education, health care, and jobs.
- b. Continue to promote fair housing education that includes religion and age discrimination in program information to ensure that discrimination is identified, not tolerated, and properly addressed regardless of type.
- c. Identify and support increased resources for complaint investigation realizing that fair housing regulations are only as good as the enforcement thereof.
- d. Support the expansion of fair housing choice enforcement into rural areas, where such issues often go unnoticed.

3. Promote Increased Public Transportation Access and Access to Job Training activities throughout the County.

Linking strategies to expand lower income housing opportunities in nontraditional areas with activities to create new or expanded job opportunities not only helps lower-income families, but may help control local labor shortages. On a regular basis, the County and The Rapid should review existing transportation routes to ensure linkages between employment centers and neighborhoods where lower-income persons and families reside. The County should also strive to secure good services and facilities in neighborhoods where economic development efforts for creating jobs and enhancing small business opportunities are underway.

In a recent study "Where will the jobs come from?" by Dane Stangler and Robert E. Litan, sponsored by the Ewing Marion Kauffman Foundation, the data shows that from 1980-2005, nearly all net job creation in the US occurred in firms less than five years old (e.g. start-up firms and young firms, ages one to five). With this in mind, Kent County will explore opportunities for partnership building with the private sector and related entities that have a mission to foster economic growth and job creation. This will be in line with HUD's view of the important role economic development plays in the long-term stabilization of communities. By exploring developing jobs and creating economic opportunities for residents, the County will begin addressing the economic opportunities for residents, the County will begin addressing the economic impediments identified earlier.

Additional Action Items:

- a. Continue participation with The Rapid's Transit Master Plan to promote and actively participate in review of existing transportation routes to link transportation and job employment centers to where lower-income persons and families reside.
- b. Increase capacity of fair housing providers and organizations in rural areas to promote access to resources in areas where mobility and transportation are limited.
- c. Coordinate with local and regional planning efforts to develop efficient transportation systems and allocation of housing and land uses.
- d. Advocate for additional adult education and vocational training opportunities, including non-English speaking alternatives.

4. Continue involvement in Regional Planning groups.

A significant constraint that the County faces is that there is no comprehensive or centralized planning organization within the County that oversees planning activities for the 30+ municipalities within it. There is also no Master Plan for the County. Such an organization and such a plan would be able to set forth a vision for appropriate locations for employment centers, high density development, transportation networks, etc. Instead, communities are left to provide fair housing on their own.

Additional Action Items:

- a. Explore opportunities to develop a **Regional Housing Plan** for Kent County with strategies and objectives for providing affordable housing throughout the County.
- b. Coordinate with GVMC and MSU Extension to incorporate Housing recommendations into broader regional policies and growth plans.
- c. Encourage mixed use development to provide opportunities for people to live near work and provide greater transportation benefits.

VI. Conclusion

A. Recommendations and Action Items

5. Create a Fair Housing web page on Accesskent.com to increase access and linkage to fair housing resources.

The County of Kent webpage is a frequent source of information for residents throughout the County. The Foreclosure Task Force reported that the majority of hits to their website comes from the accesskent weblink. The County can promote fair housing education by providing a resource on their webpage and sharing this information with the 33 local units of government.

Additional Action Items:

- a. Include copies of all fair housing resources currently distributed to program participants in the Housing Choice Voucher program (tenants and property owners).
- b. Include links to other relevant Fair Housing information sites.
- c. Provide model language to municipalities and townships to assist in implementing Housing Plan elements by highlighting existing plans such as Kentwood.

6. Promote County-wide Source of Income Protection.

The Cities of Grand Rapids, Kentwood, and Wyoming have source of income protection requirements, meaning that property managers cannot turn away a renter because they are using vouchers as part of their rent. None of the other communities have this type of requirement. During the Focus Group sessions, several anecdotes were shared of residents who had either been turned away by landlords who would not accept a Housing Choice Voucher or had been denied certain benefits or amenities because they were using a voucher.

These practices underlie the difficulties finding affordable housing in communities that place a stigma on assisted housing. With source of income protection, where vouchers are treated equally as cash, residents using this aid are free to live anywhere within the community. This can begin to lead to broader acceptance of diversified housing and mixed income development and lessen the stigma in place in many communities.

Additional Action Items:

- a. Explore the establishment of Source of Income protection throughout the County.
- b. Promote broader acceptance of vouchers and development of affordable housing county-wide through public information on the facts about Housing Choice Vouchers and their purpose.
- c. Attend at least one meeting of the Regional Property Managers Association annually to provide a point of reference for property owners who may or may not be participating in the program.

7. Cooperate with public/private institutions to provide better access to aid and financing through continued participation in local task forces.

The County shall continue to review current policies and procedures in light of private sector (e.g. banking, financial institutions, real estate brokers, and insurance companies) practices to determine what, if any, changes might be made to strengthen their role where private sector practices appear to discriminate or otherwise contribute to restricted housing choice. Kent County should review lending and appraisal practices through formal surveys or informal means to examine policies, procedures, and practices for possible differential treatment of home mortgage loans, home insurance, or home improvement loans based on race, ethnicity, gender, disability status, and familial status. Support of the Fair Housing Center of West Michigan annual workshops and luncheon facilitates accountability between local lending institutions and fair housing advocates.

Additional Action Items:

- a. Facilitate tracking of financing disparities through download and analysis of annual HMDA data.
- b. Seek Spanish speaking fair housing educators to address changing demographics and assist with all aspects of home ownership/rental requirements.
- c. Continue to support the work of the Fair Housing Center of West Michigan in educating local lenders on fair lending practices and local trends and best practices in the lending industry.

VI. Conclusion

A. Recommendations and Action Items

8. Further explore Rental Registration and Landlord Training Program.

Between new investment opportunities created by the increased rate of foreclosures and the ease of access to information provided by the internet, new landlords and property managers are entering the market every day. These landlords often lack the proper training and education, particularly in regards to fair housing, to avoid violations. Unfortunately, many internet sites do not have the controls in place to monitor such violations and ensure they are not published. These violations may not be intentional, but they are made.

By requiring that landlords be registered and also register their rental properties, communities can require that the landlords receive proper training on fair housing requirements. This can also provide an opportunity to inspect the property for building or property maintenance code violations. This list can also be an effective aid to assist persons searching for available and eligible affordable properties when seeking a place to live. Alternatively, affordable housing providers and other community housing professionals seek assurance that institution of rental registration and inspections will not create a costly barrier to provision of affordable housing, i.e. by creating an annual fee per unit. Municipalities may also lack resources to efficiently implement new programs without negatively impacting low-income tenants in the process when code violations cannot be corrected in a timely manner.

Additional Action Items:

- a. Carefully identify the objectives of rental registration and potential impacts and cost of implementation.
- b. Where rental inspections are currently taking place, advocate for adequate follow up on violations, particularly egregious offenders who own multiple properties in low income neighborhoods.
- c. Continue to support housing inspection efforts of the Health Department and housing rehabilitation for units identified through housing inspection activities.

9. Increase Access to Affordable Housing Opportunities.

Development of new or rehabilitated housing for lower-income people is one of the most controversial issues communities face. If fair housing objectives are to be achieved, the goal must be to avoid high concentrations of low-income housing. "NIMBYism" seriously affects the availability of housing for low-income families, persons with disabilities, homeless persons, or lower-income minorities and is one of the most difficult challenges jurisdictions encounter in promoting fair housing objectives. The attitude of local government officials, public pronouncements of general policy, and careful planning and

implementation of individual housing efforts by providers are key aspects for overcoming resistance of this kind. In addition, contextual planning of new affordable housing with relationship to scale, size, density, and architectural character of the neighborhoods where it will be located is vital to integration and success.

HUD encourages communities to adopt initiatives that will expand housing choices for persons with disabilities so that persons with disabilities will have the same ranges of housing choices as persons without disabilities. For example, the County, Housing Commission, and private landlords that participate in the Section 8 Certificate and Voucher program could join resources to provide funds for the removal of architectural barriers in housing operated by private landlords to make these projects accessible to people with disabilities.

The concept of “visitability” allows mobility impaired residents to visit families and friends where this would not otherwise be possible. A visitable home also makes it easier on mothers pushing strollers, a person delivering large appliances, a person using a walker, etc. The County and Housing Commission should encourage the inclusion of visitable features in future homeownership and rental projects.

Additional Action Items:

- a. Provide rehabilitation programs, particularly to elderly residents who are unable to perform basic maintenance and upkeep.
- b. Continue to receive referrals from the Health Department for homeowners needing assistance with housing-related health and safety violations.
- c. Ensure that minimum accessibility standards are being adhered to through strict enforcement of building codes.
- d. Incorporate visitability standards into Kent County HOME new construction guidelines over the next few years to increase the number of visitable units in the community.
- e. Support local units of government in requiring that bank-owned properties are adequately maintained to ensure safety of surrounding neighborhoods.
- f. Identify public-private partnerships to implement housing choice strategies- housing rehabilitation services, financial institutions, etc.

Ultimately, providing adequate housing and improving existing neighborhoods are vital functions and should always be encouraged. When steps are taken to assure that the housing is fully available to all residents of the community regardless of race, color, religion, age, sex, national origin, gender, disability, or familial status, those are the actions that affirmatively further fair housing.

VII. Signature Page

VII. Signature Page

Kent County, Michigan, as a recipient of CDBG funds and in order to comply with its certification to Affirmatively Further Fair Housing (AFFH), has conducted an Analysis of Impediments to Fair Housing Choice update to assess the availability of fair housing choice within Kent County. We affirm that Kent County, Michigan will support the activities to assure nondiscrimination in the provision of housing and its accompanying transactions.

Sandra Frost Parrish, Chair

Kent County Board of Commissioners

Date

Ted Vonk, Vice-Chair

Kent County Board of Commissioners

Date

Linda S. Likely

Director, Housing and Community Development Department

Kent County

Date

VIII. Appendix

Focus Group Summary

VIII. Appendix

Supplementary Information includes:

A. Focus Group Summary

Kent County Analysis of Impediments

Focus Group Session #1 – December 2, 2010

Compared to five years ago, the fair housing situation in Kent County is: BETTER, WORSE, or THE SAME?

- It's a little better
 - Seeing connections between housing choice and other aspects of life – education, health care, jobs
- Complaints are up, but that may be as much due to the efforts of the FHC to increase visibility
 - Not necessarily due to increased discrimination
 - People now more aware of how to complain, who to contact, what to do, and what discrimination is
- Internet is changing things for the worse
 - Bringing many new, untrained people into the housing market
 - Lots of sites do not have much oversight and create opportunities for housing violations
- FHC outreach efforts have helped
 - People more educated about fair housing efforts
- Still bad actors out there set on limiting housing choice
- However lots of discrimination is unintentional
 - People don't even know they are doing it.

What are some of the issues that are out there?

- Seniors want to stay in their homes, stay in their neighborhoods
 - Requires rehabilitation in order to maintain larger, older homes
 - Historic preservation codes / ordinances are significant impediment
 - All aspects of renovation are more difficult in areas subject to these regulations
 - Paint, porch, wheelchair ramps, etc.

- Grand Rapids Historic Preservation Commission said that they do not like Universal Design for aesthetic reasons (window design for example)
- Prevailing Wage and historic preservation may also create issues as they increase costs of redevelopment through the use of HUD funding at the local level
 - Must comply with these requirements
- Equity in homes has dropped so seniors are now limited in their ability to sell and move to new senior housing
 - Economic impediment
- Reverse mortgages – predatory practices
 - Trend is up on preying on seniors with bad financing deals

Are some protected classes more affected by housing discrimination than others?

- Race
 - This is outwardly obvious to people. Others, like religion, are not as obvious to people
 - Historically has been the #1 in the County
- Disability is on the rise
 - Denial of reasonable location / access by condo boards
 - They do not want to make certain accommodations / modifications for aesthetic reasons, although they are required
- Human models in advertising
 - In reviewing use of humans in housing ads, found them to be mostly white
 - People of color were used mostly in a serving capacity – driver, wheelchair pusher
- Religion – hot button in the area
 - Many senior communities are affiliated with a church, or if they are not, have Christian information identified on their website
 - Limits access for non-Christian seniors
- Gender / marital status
 - Happening a lot on craigslist
 - No limits, so easy for unintentional uses
- Student status
 - Not a protected class, but really another way of saying age
- Undocumented immigrants do have fair housing rights, but rarely go on record with complaints

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Focus Group Summary

- Migrant housing (review state report on this)
 - It is an issue in the County
 - Substandard housing
 - Lack of affordable housing available in out-county areas
 - No public transportation to out-county areas
 - Lack of safe / adequate housing if provided – overcrowding
- Undocumented immigrants able to get loans but will not apply for help when they need it, so when in trouble, will live without heat or in problems
- Overcrowding is an issue generally
 - Not adequate resources for housing
 - No address for voucher as required
 - Also a problem for homeownership
 - Primarily economically driven

Are there areas in the County that have an inadequate amount of assisted / affordable housing?

- Some areas have concentrations of affordable housing because it is known that landlords will not check credit
 - Lots of people have bad credit
- Lack of source of income protection is limiting
 - Outside of Wyoming, Grand Rapids, and Kentwood – no requirement that someone with public housing assistance be taken
 - Apt / unit managers get same money but can provide substandard units
- Out county problems created by transportation
- Rate of increase of poverty rising higher outside Wyoming and GR, where services are not ready to handle these issues
 - Out-county areas facing rising poverty without infrastructure to support it
 - Foreclosures have brought this home
- Interesting foreclosure note – disparity of bank maintenance of foreclosed property based on location / composition of neighborhood
- Education / outreach – can always do better
 - Investors, brochures
 - Require registration for landlords and make training a requirement for registration
 - Most don't have registration – Wyoming does
- Educate children on fair housing – take home info for parents
- Agencies / providers should have branches elsewhere than central Grand Rapids

- Transportation creates a barrier
 - Out-county residents lack services and ability to get services
- Silverline down Division may provide a solution for transit to the south
 - Expensive solution publicly
- Infrastructure for providing services / safety net needs to adapt to changing economy / population
 - Wyoming beginning to study this

Wish List – What would you recommend the County do for the next five years to address these issues?

- Countywide Fair Housing Ordinance
- More education out-county
 - Government
 - Some out-county communities were considering zoning standards that required stoops in new homes or banned ranch and bi-level homes
 - Help them achieve their desired goals / aesthetics while meeting fair housing laws
 - Residents – NIMBY issues
 - Industry
- Funding
 - Investigation of complaints
 - Lots of funding goes to GR, getting some funding for the rest of the County
- Expanded services in other communities
 - Job training
 - Adult education / GED
 - Safety-net services (not just in GR) such as ICCF and Habitat
- English as a Second Language
 - Spanish speaking population is increasing
 - Translators not available, neither are trainers
 - Other languages are increasing too
 - Problems reading leases, mortgages, talking with providers, completing forms, etc.
- Build partnerships
- Access to parks, health care, jobs
 - Hard to find employees and house them
- Housing = schools

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Focus Group Summary

- Schools are very segregated
 - Transportation – have to be able to get to various schools and limit ability to move around
 - Steering – realtors direct new residents where to buy with focus on schools

Kent County Analysis of Impediments

Focus Group Session #2 – December 3, 2010

Compared to five years ago, the fair housing situation in Kent County is: **BETTER, WORSE, or THE SAME?**

- Worse – complaints have increased
- Not sure it is worse
 - Residents know more and are more educated, so they are more likely to raise issues and complaints
- Licensure is a good thing cause it can lead to fair market training
 - Not required though for property managers
- Foreclosures have increased, so the number of landlords / investors have increased
 - Many are inexperienced without training
 - Leads to many issues
- Family discrimination is up
 - Inexperience of landlords – just trying to be helpful
- Not necessarily better or worse – but changing
- Landlord don't realize they are putting their values or ideas into housing choice decisions and are violating fair housing
- Challenge is implementing the education
 - Overcoming old habits and language
- There are some people doing things intentionally
- When you decide to rent, it is your responsibility to know fair housing laws
 - May require training
 - Require training with certification – but this requires certification / registration
- Requirements to rent SF or smaller units less than larger – training
- No transit in outlying areas
 - Cost is prohibitive and only limited connections are available outside six central communities
 - Zoning laws may be impediment limiting potential impact of transit
 - Not funded by out-county – only funded by 6 municipalities
- Only reason why people would live in rural areas is lower cost and family, but transportation costs and lack of services would equalize

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Focus Group Summary

- Impediments created by lack of sidewalks or unshoveled sidewalks in out-county areas
 - Creates difficulty accessing bus stops for disabled
- Seniors
 - Money and transportation are key issues
 - Significant part of population who can't find housing because not rich enough but also not poor enough.
 - Also people have big old houses that can't maintain them or pay utilities
- New lead based paint law is a problem and has tied hands of providers
 - Significant increase in costs
 - Too expensive now for some basic repairs
- Universal design issues not being incorporated into new construction and development
 - But tough to retrofit the existing housing stock – much more expensive
- Also limits on renovation based on income limits and regulations of HUD programs and guidelines
- Some of the housing stock that is being rehabbed really should be torn down
 - But the community does not want to demo neighborhoods so the cost increases in order to maintain the structure
- Affordability
 - 84,000 households in County paying more than 48% on housing and transportation – exceed affordability
 - Economic barrier
 - Encourage mixed use to alleviate transportation costs
- There may also be prejudices built into the culture of the tenants
 - At the consumer end, there are preferences
 - We need to create a system where people have the ability to make the choices they want to make
- People get vouchers but cannot use them everywhere
 - Segregated communities
 - With vouchers, don't have choices of all the neighborhoods
 - Ties back to institutional discrimination
- Access to housing choice leads to other services / benefits
 - Food, goods, health care, parks
- Grand Rapids, Wyoming, Kentwood – protected to accept voucher
 - Others – landlord can reject voucher
 - Fair Housing Ordinance may be tool to implement this

- Barrier – perception of population with vouchers
- Stigmas against mental illness, substance abuse, developmental abilities
 - Most located in adult foster care
 - AFC provides decent care
 - But resistance is common
- If everyone took vouchers, stigma would go away
 - Impact would be watered down
 - Concentration would go away

Wish List – What would you recommend the County do for the next five years to address these issues?

- Transit oriented development
 - Include transportation in design of new development
 - Do not make transportation an afterthought
- Education about fair housing
 - Educate populations who may have rights impacted
 - Social service agencies that may contract populations who are impacted
- If going to be a landlord, require fair housing training
 - Landlord certification
- Expand income protection through County
- Lot of lending / mortgage issues
 - Predatory lending for low income
 - Reverse mortgage for seniors.
- Illegal immigrants
 - Landlord sometimes take advantage and hold this over their head
 - They can get loans and take risks
 - Sometimes no a FH violation but just downright violation
- Housing subsidies are not easy – lots of paperwork
 - Annual inspections
 - Very technical / confusing
 - Also a barrier for people to get into it
 - Part of national reform movement

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Zoning, Site Selection, and Property Tax Policy Survey Results

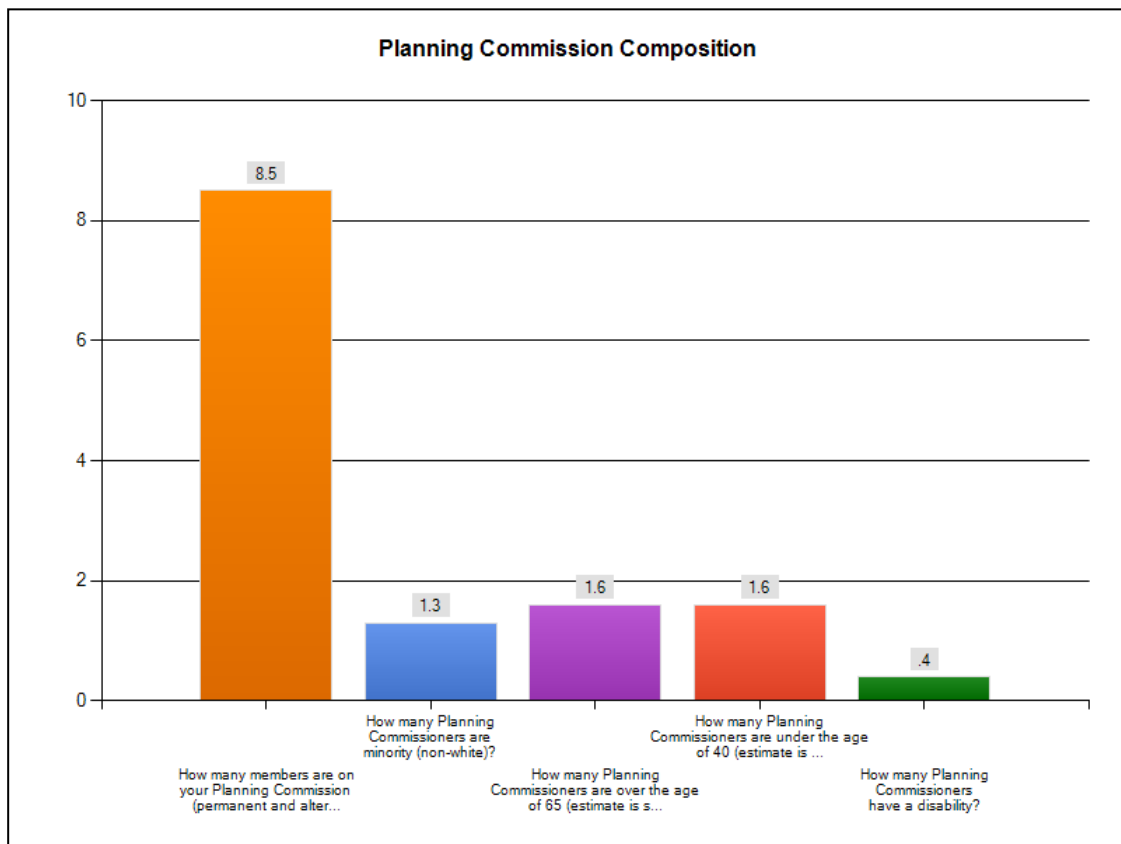
B. Zoning, Site Selection, and Property Tax Policy Survey Results

Below is a summary of the results from the survey distributed to representatives of Kent County Communities. Some questions have been omitted to protect the identity of communities that participated in the survey. A narrative analysis of responses is included on Page[39](#) (Zoning and Site Selection) and Page[65](#) (Property Tax Policies).

1. Questions regarding Planning Commission Composition:

- How many members are on your Planning Commission (permanent and alternate)?
- How many Planning Commissioners are minority (non-white)?
- How many Planning Commissioners are over the age of 65 (estimate is sufficient, not necessary to verify exact age of Commissioners)?
- How many Planning Commissioners are under the age of 40 (estimate is sufficient, not necessary to verify exact age of Commissioners)?

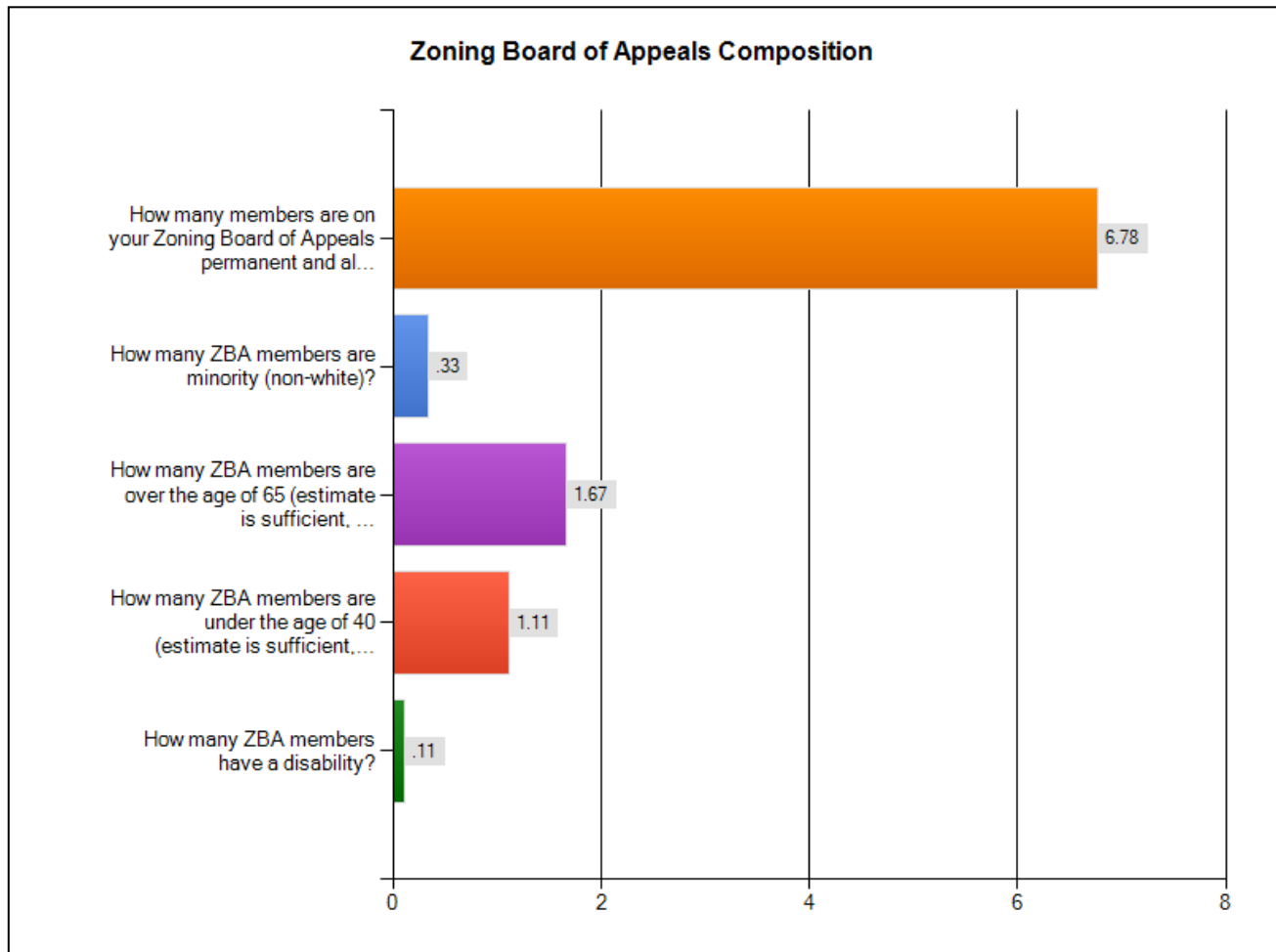
Responses (NOTE: The numbers shown at the top of each bar in the graph below constitute the average value for all responding communities):



2. Questions regarding Zoning Board of Appeal Composition:

- How many members are on your Zoning Board of Appeals (permanent and alternate)?
- How many ZBA members are minority (non-white)?
- How many ZBA members are over the age of 65 (estimate is sufficient, not necessary to verify exact age of members)?
- How many ZBA members are under the age of 40 (estimate is sufficient, not necessary to verify exact age of members)?

Responses (NOTE: The numbers shown at the end of each bar in the graph below constitute the average value for all responding communities):

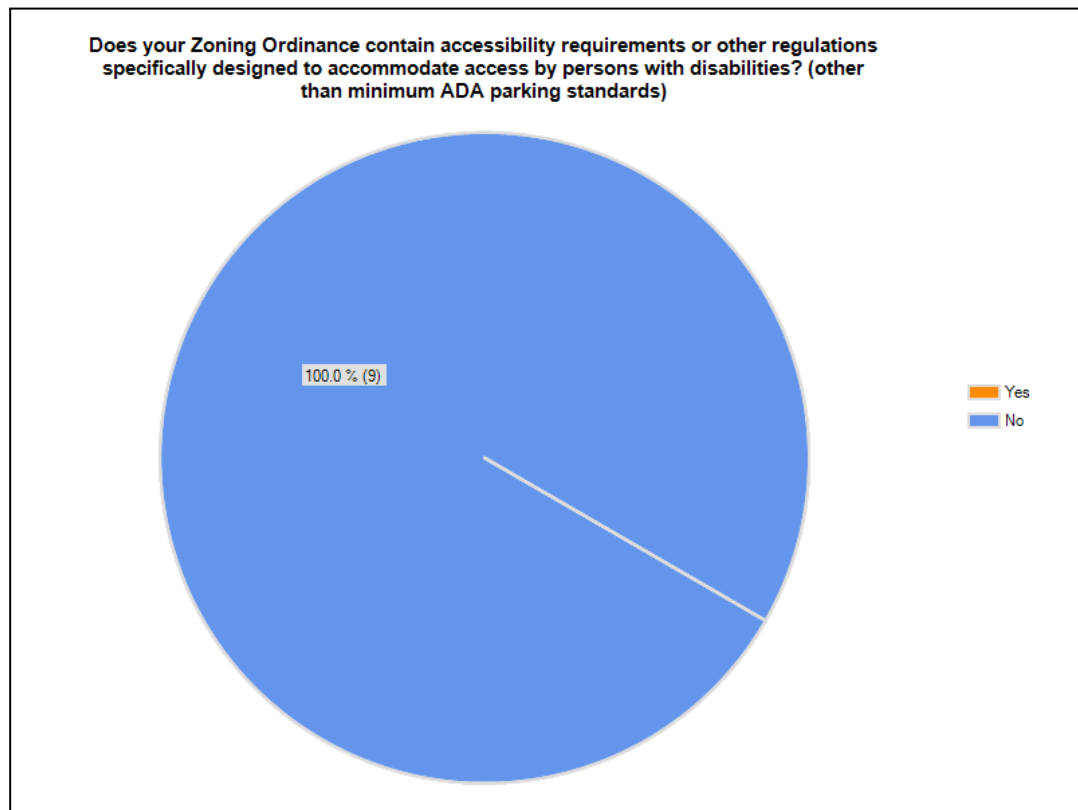


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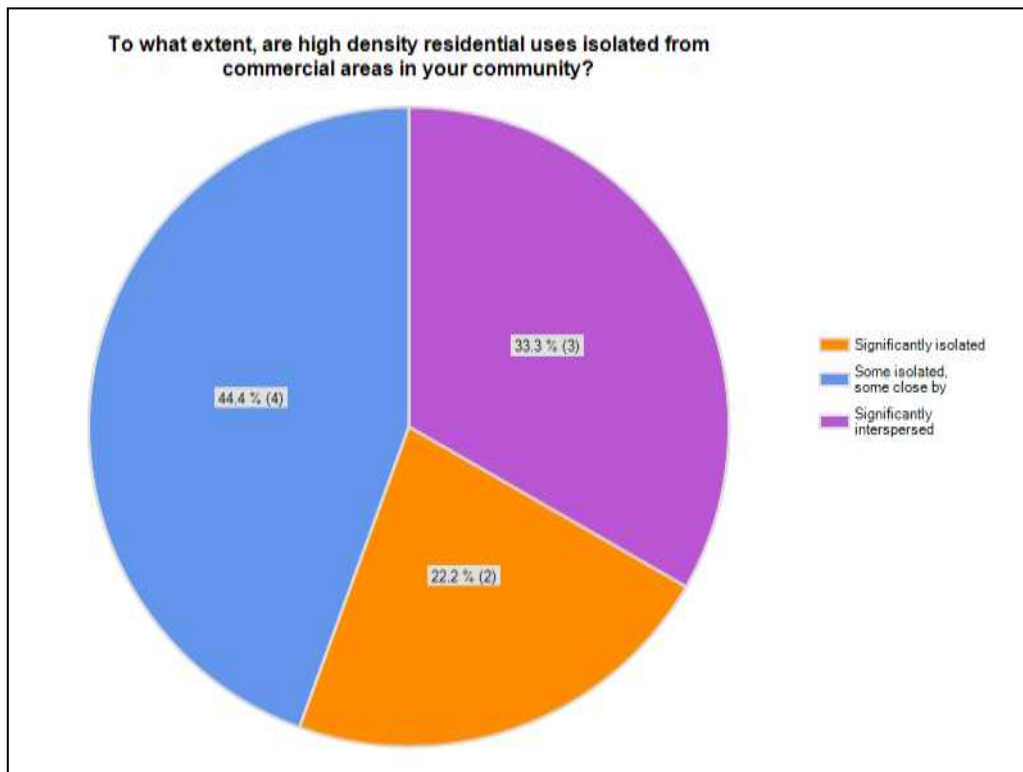
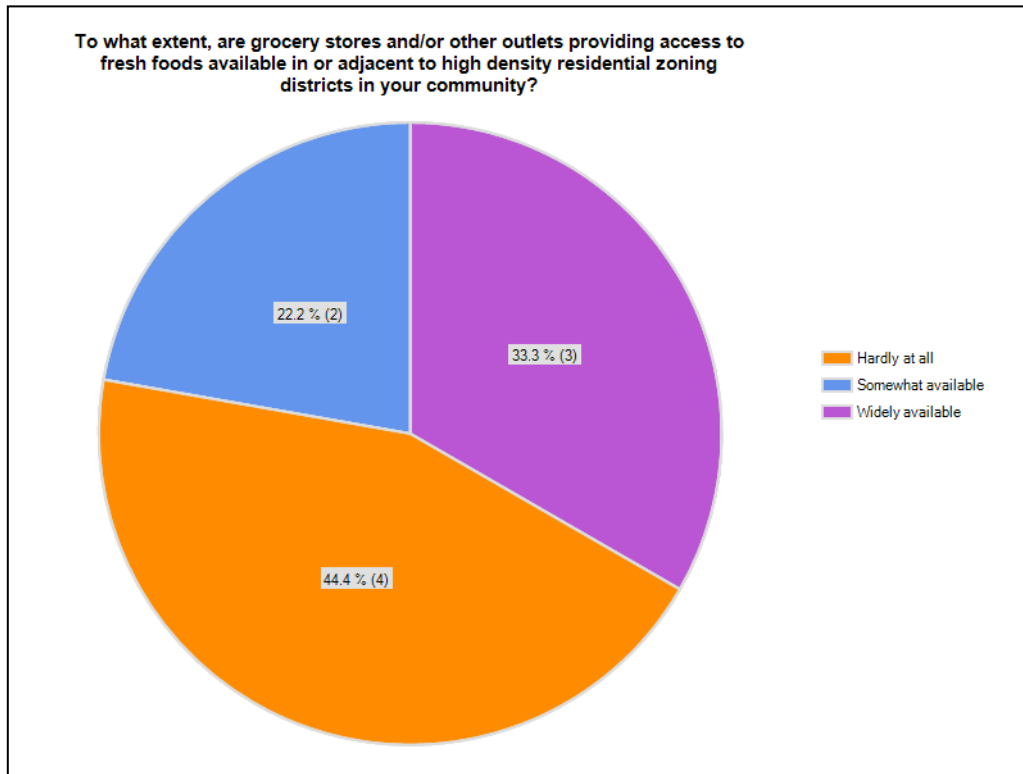
Zoning, Site Selection, and Property Tax Policy Survey Results

3. Questions regarding Zoning Ordinance Regulations:

- What is the largest minimum lot size required for a new residential lot?
 - 10,000 square feet
 - 10,800 square feet
 - depends upon zoning
 - 5 acres
 - 3 acres for a single-family res. lot in agricultural zone
 - 1 acre
 - 2 acre
 - 12,000 SF
- What is the smallest minimum lot size allowable for a new residential lot?
 - 8,400 square feet
 - 5,000 square feet
 - depends upon zoning
 - 5,500 square feet
 - 13,500 sq. ft. for a single-family residential lot w/ sewer
 - 5,000 Sq. Ft. per family unit
 - 18,000sq.ft min. lot width of 90 feet at the bldg. line
 - 2 acres
 - 5,000 square feet

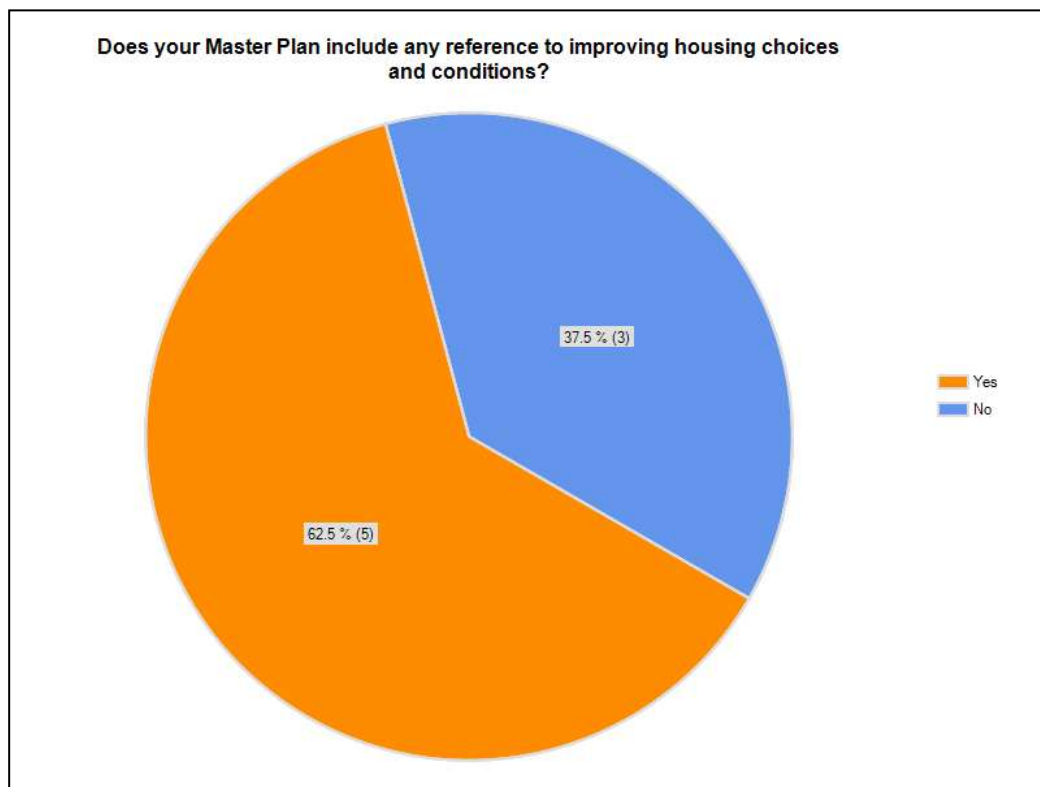
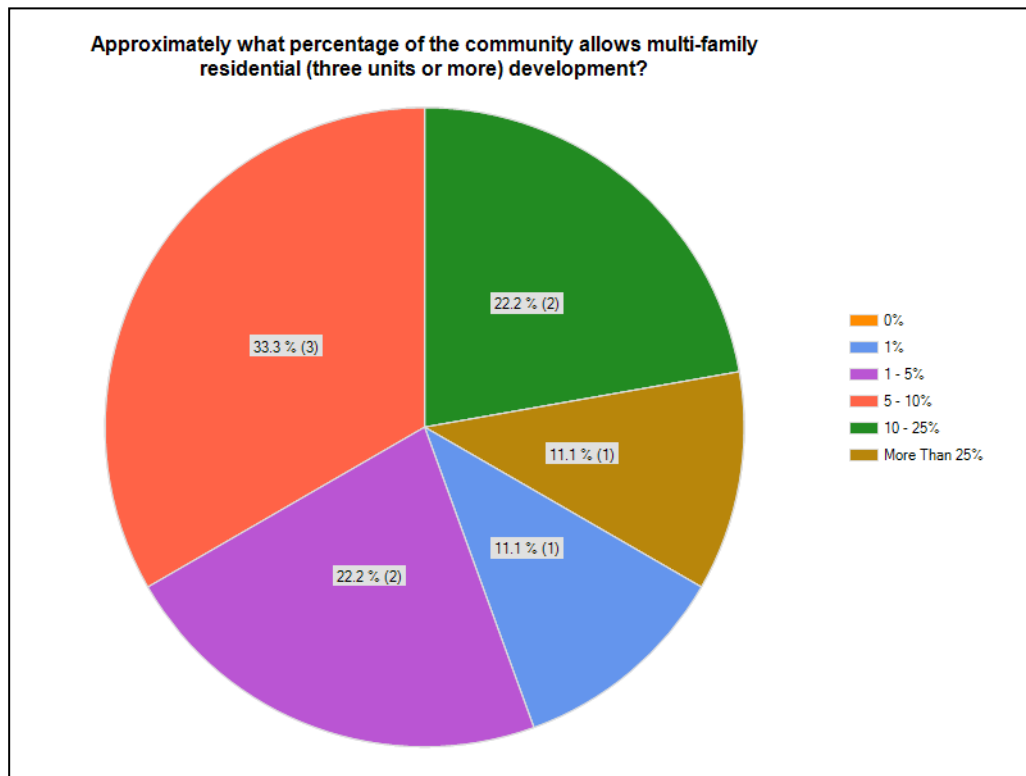


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Zoning, Site Selection, and Property Tax Policy Survey Results

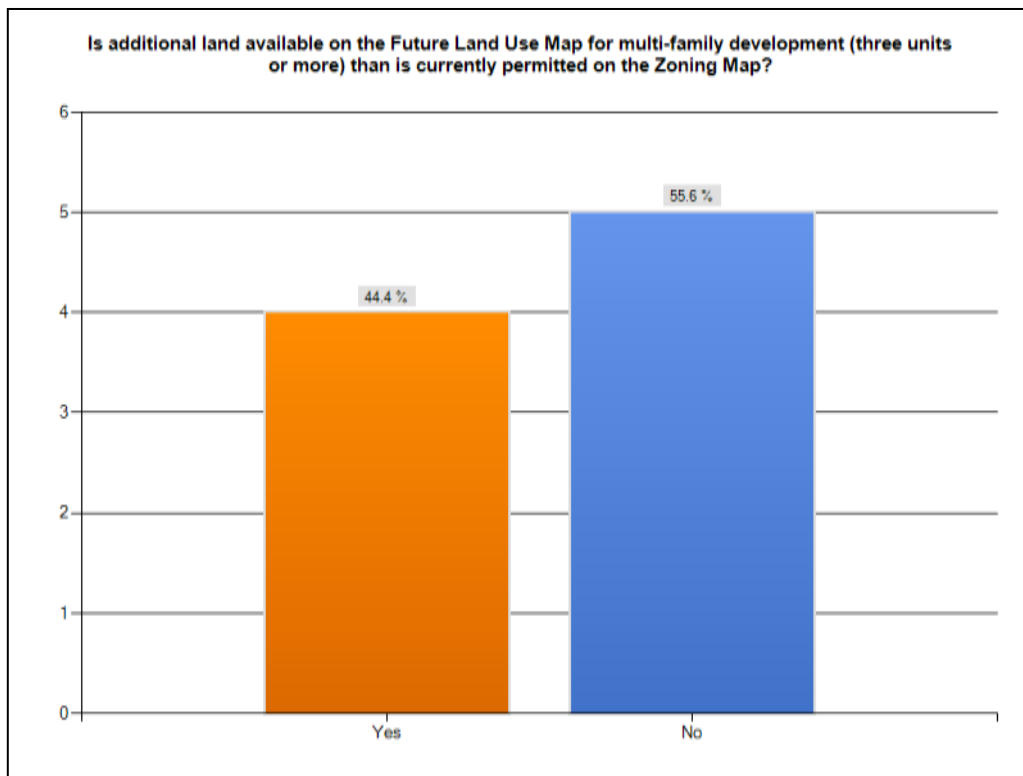
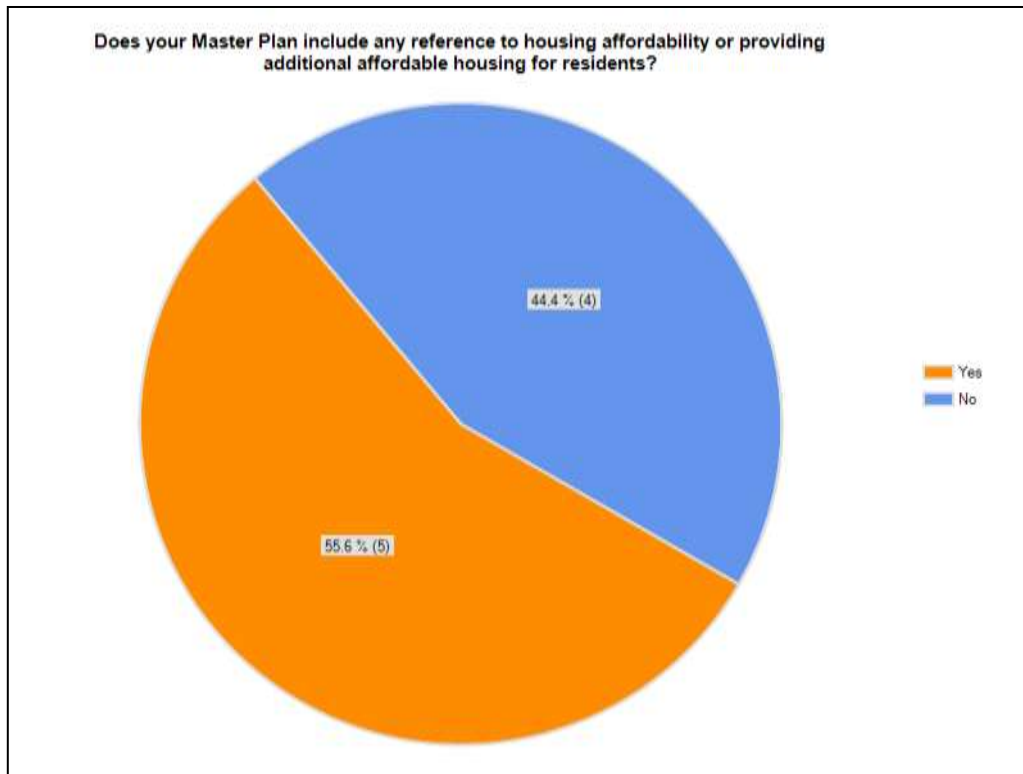


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Zoning, Site Selection, and Property Tax Policy Survey Results



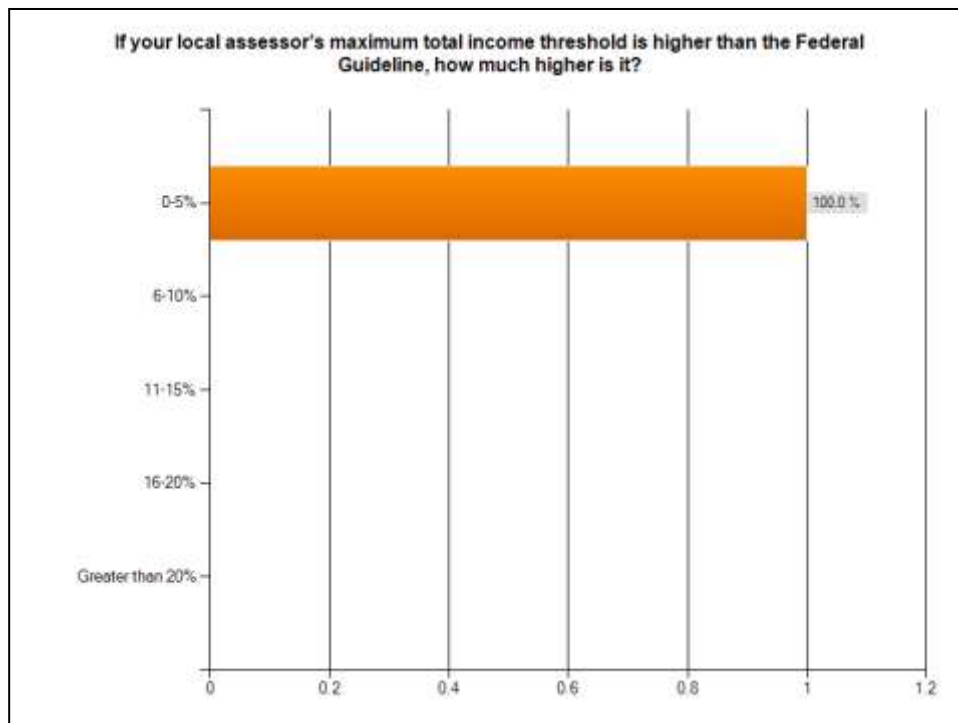
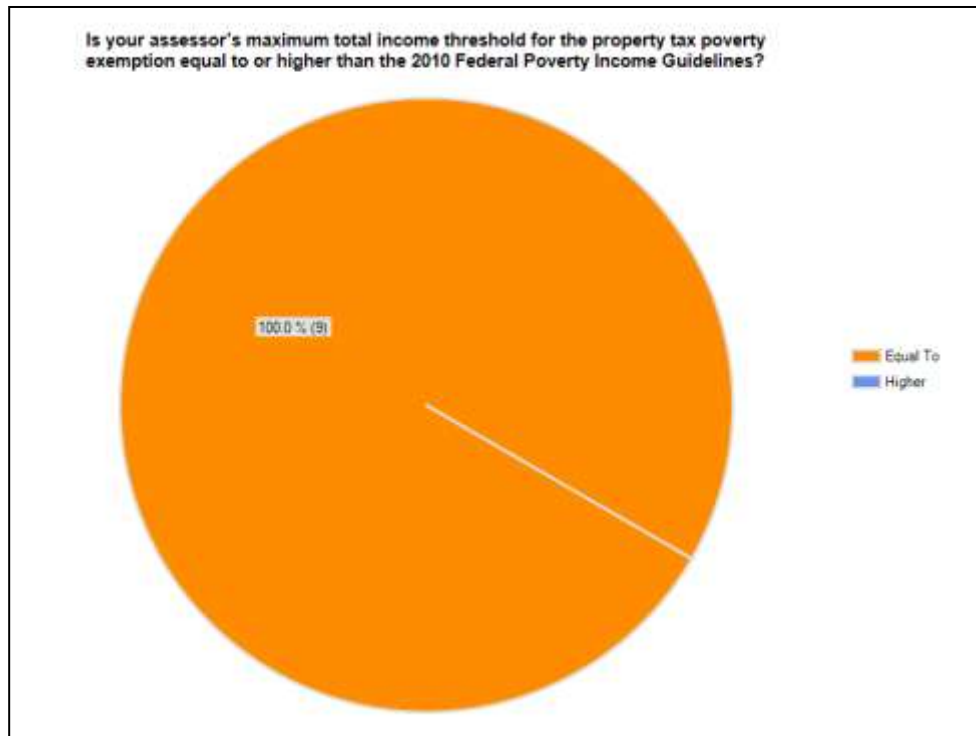
4. Questions regarding Master Plan Elements

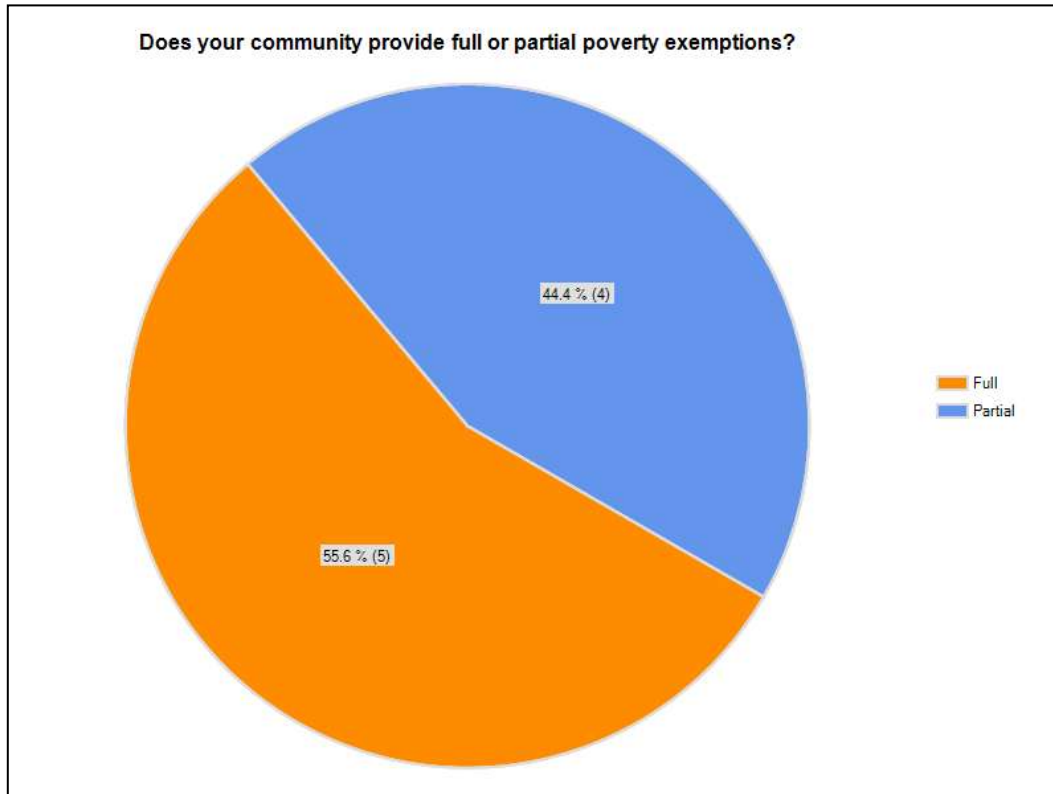
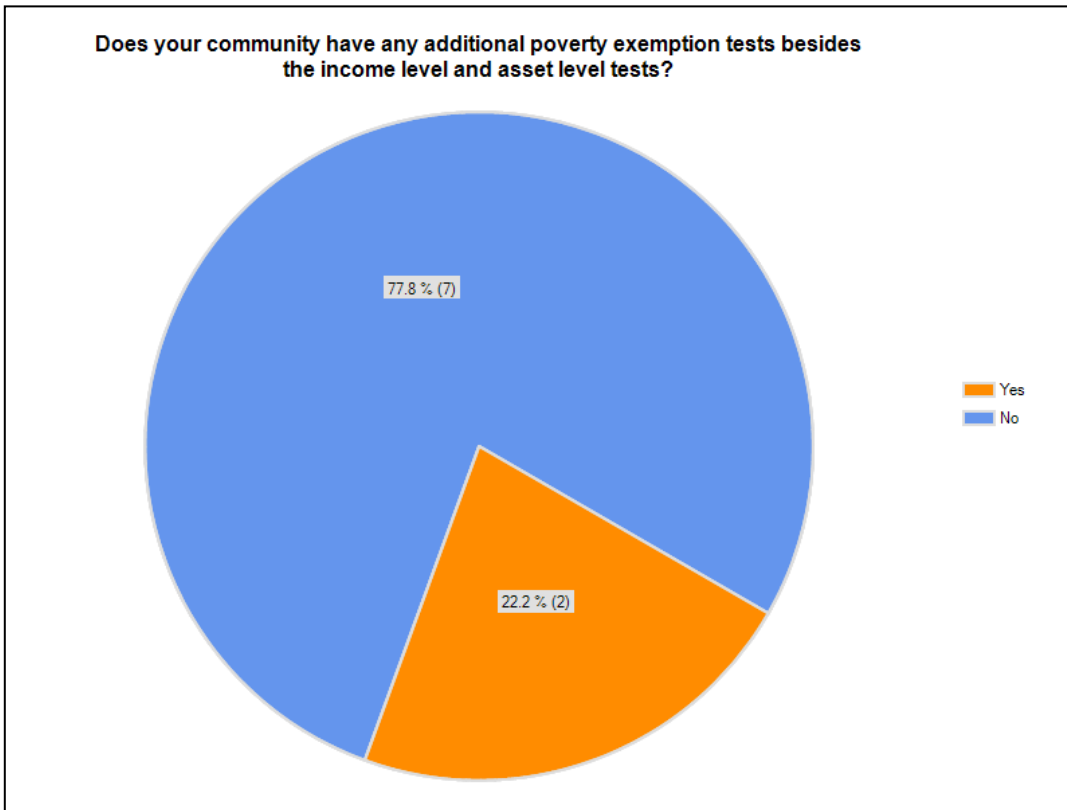


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Zoning, Site Selection, and Property Tax Policy Survey Results

5. Questions regarding Property Tax Policies





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Fair Housing Discrimination Complaints

C. Fair Housing Discrimination Complaints

1. Open Cases

Table 22: Open Fair Housing Discrimination Cases; 2009-January 2011

Discrimination Location	Claimant Address	Respondent Address	Contact Date	Issue/Basis
Comstock Park, MI		Comstock Park, MI	7/21/09	Housing, E-mail, Referred by HUD, Other terms & conditions (Familial Status)
Comstock Park, MI	Grand Rapids, MI	Comstock Park, MI	9/4/09	Housing, E-mail, Referred by HUD, Advertising (Familial Status)
Grand Rapids, MI	Wyoming, MI	Grand Rapids, MI	11/6/09	Housing, Telephone, Repeat customer, Other, Failure to accom. disability (Disability, Physical Disability) (Other impairment)
Grand Rapids, MI	Grand Rapids, MI	Wyoming, MI	12/9/09	Housing, Other Hispanic / Latino, Multi-Racial, Unscheduled visit, Repeat customer, Eviction (National Origin, Age)
Wyoming, MI	Kentwood, MI	Ada, MI	5/17/10	Housing, Multi-Racial, Telephone, Referred by HUD, Failure to rent (Familial Status)
Kentwood, MI	Grand Rapids, MI	Kentwood, MI	6/4/10	Housing, Telephone, Referred by HUD, Failure to rent (Familial Status)
Grandville, MI	Grandville, MI	Grandville, MI	6/8/10	Housing, Black or African American, E-mail, Referred by HUD, Other terms & conditions (Race)
Sparta, MI	Grand Rapids, MI	Sparta, MI	6/29/10	Housing, E-mail, Referred by HUD, Advertising (Familial Status)
Grand Rapids, MI	Kentwood, MI	Grand Rapids, MI	7/9/10	Housing, E-mail, Referred by HUD, Eviction (Disability , Physical Disability) (Heart/cardiovascular impair., Diabetes)
Walker, MI	Walker, MI	Walker, MI	8/30/10	Housing, American Indian/Alaska Native, Telephone, Repeat customer, Real Estate; Rental; Leasing, Other terms & conditions (Race)

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Fair Housing Discrimination Complaints

Discrimination Location	Claimant Address	Respondent Address	Contact Date	Issue/Basis
Kentwood, MI	Grand Rapids, MI	Farmington Hills, MI	9/29/10	Housing, White, Telephone, Mass media, Other, Eviction (Disability , Physical Disability, Retaliation) (Other impairment)
Kentwood, MI	,	Kentwood, MI	10/18/10	Housing, Black or African American, E-mail, Referred by HUD, Failure to rent (Race)
Caledonia, MI	Cutlerville, MI	Caledonia, MI	10/28/10	Housing, White, Mail, Referred by HUD, Harassment/Not Sexual (Race)
Grand Rapids, MI	Kentwood, MI	Farmington Hills, MI	10/29/10	Housing, Black or African American, Telephone, Other, Real Estate; Rental; Leasing, Failure to rent (Race)
Kentwood, MI	Grand Rapids, MI	Kentwood, MI	11/24/10	Housing, Black or African American, E-mail, Referred by HUD, Other, Failure to rent (Race, Disability, Physical Disability) (Other impairment)
Kentwood, MI	Kentwood, MI	Kentwood, MI	1/10/11	Housing, Telephone, Other, Other, Failure to accom. disability (Disability, Physical Disability) (Nonparalytic orthopedic impair)

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Fair Housing Discrimination Complaints

2. Closed Cases

Table 23: Closed Fair Housing Discrimination Cases; 2008-2010

Discrimination address	Claimant Address	Respondent address	Issue/Basis	Close Date	Close Type
Grand Rapids, MI	Kentwood, MI	Grand Rapids, MI	Housing, Black or African American, Telephone, Mass media, Other terms & conditions ()	6/6/08	Lack of Jurisdiction for MDCR
Wyoming, MI	Wyoming, MI	Wyoming, MI	Housing, Telephone, Other terms & conditions ()	6/6/08	Customer declined to file
Caledonia, MI	Caledonia, MI	Caledonia, MI	Housing, White, Telephone, Mass media, Other terms & conditions ()	6/30/08	Lack of Jurisdiction for MDCR
Wyoming, MI	Wyoming, MI	Wyoming, MI	Housing, Jamaican, Black or African American, Mail, Referred by HUD, Other terms & conditions (National Origin , Race)	12/19/08	Withdrawn - Adjustment
Grand Rapids, MI	Comstock Park, MI	Grand Rapids, MI	Housing, Black or African American, Mail, Public Administration, Other terms & conditions ()	12/29/08	Insufficient grounds to file, incl. no standing to file
	Rockford, MI		Housing, E-mail, Mass media, Other,	2/21/09	Lack of Jurisdiction for MDCR
	Kentwood, MI		Housing, Black or African American, Mail, Referred by other agency, Other terms & conditions (Race)	3/24/09	Untimely
Wyoming, MI	Wyoming, MI	Wyoming, MI	Housing, Other Hispanic / Latino, Multi-Racial, Telephone, Harassment/Not Sexual (National Origin), Sexual harassment (Sex)	3/25/09	Insufficient evidence - No Adjustment
Holly, MI	Holly, MI	Cedar Springs, MI	Housing, White, Telephone, Claims by others, Business services, Failure to accom. disability (Disability, Mental Disability) (Heart/cardiovascular impair., Cancer, Diabetes)	3/31/09	Withdrawn - Adjustment

VIII.Appendix
Fair Housing Discrimination Complaints

Discrimination address	Claimant Address	Respondent address	Issue/Basis	Close Date	Close Type
Wyoming, MI	Wyoming, MI	Wyoming, MI	Housing, Other Hispanic / Latino, Multi-Racial, Telephone, Harassment/Not Sexual (National Origin)	4/2/09	Post-Investigation Settlement Agreement / Adjustive Action
	Wyoming, MI	Allendale, MI	Housing, Telephone, Referred by other agency, (Depression)	4/6/09	Insufficient grounds to file, incl. no standing to file
Wyoming, MI	Wyoming, MI	Wyoming, MI	Housing, White, Unscheduled visit, Mass media, Harassment/Not Sexual (Age)	4/24/09	Insufficient evidence - No Adjustment
	Cedar Springs, MI	Grand Rapids, MI	Housing, White, Telephone, Referred by other agency,	5/1/09	Lack of Jurisdiction for MDCR
	Wyoming, MI	Grand Rapids, MI	Housing, Telephone, Referred by other agency, Real Estate; Rental; Leasing,	6/17/09	Customer declined to file
Grand Rapids, MI	Grand Rapids, MI	Rockford, MI	Housing, Black or African American, Telephone, Referred by other agency, Eviction (Race)	6/30/09	Insufficient evidence - No Adjustment
Wyoming, MI	Grand Rapids, MI	Wyoming, MI	Housing, White, Claims by others, Other, Failure to rent ()	8/5/09	Lack of Jurisdiction for MDCR
Grand Rapids, MI	Ada, MI	Royal Oak,MI	Housing, Black or African American, E-mail, Other, Real Estate Developer, Other terms & conditions (Race, Age), Eviction (Race, Age, Retaliation)	9/1/09	Insufficient evidence - Adjustment
Kentwood, MI	Wyoming, MI	Kentwood, MI	Housing, Telephone, Other, Other terms & conditions (Age , Disability , Physical Disability) (Nonparalytic orthopedic impair, Heart/cardiovascular impair.)	10/14/09	Customer declined to file
Wyoming, MI	Wyoming, MI	Kentwood, MI	Housing, Black or African American, Telephone, Eviction (Race)	11/19/09	Adjusted - customer satisfied

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Fair Housing Discrimination Complaints

Discrimination address	Claimant Address	Respondent address	Issue/Basis	Close Date	Close Type
	Grand Rapids, MI	Rockford, MI	Housing, E-mail, Referred by HUD, Advertising (Familial Status)	10/9/09	Withdrawn - No interest in pursuing w/ MDCR / fed agency
Kentwood, MI	Grand Rapids, MI	Kentwood, MI	Housing, Mexican, E-mail, Referred by HUD, Other, Other terms & conditions (National Origin)	11/16/09	Insufficient evidence - No Adjustment
Grand Rapids, MI		Wyoming, MI	Housing, Multi-Racial, Mail, Repeat customer, (Other (Write In))	1/5/10	Created in error
	Kentwood, MI	Kentwood, MI	Housing, White, Telephone, Mass media, Other terms & conditions (Disability , Physical Disability) (Other impairment)	2/22/10	Withdrawn - Adjustment
	Grand Rapids, MI	Wyoming, MI	Housing, E-mail, Referred by other agency, Single, Advertising (Marital Status)	3/15/10	Wrong respondent
	Grand Rapids, MI	Cedar Springs, MI	Housing, E-mail, Referred by HUD, Advertising (Familial Status)	4/27/10	Settlement Agreement
	Rockford, MI	Howard City, MI	Housing, White, Mail, Other, Other terms & conditions ()	5/5/10	Lack of Jurisdiction for MDCR
Kentwood, MI	Kentwood, MI	Kentwood, MI	Housing, Mexican, Appointment, Repeat customer, Other, Eviction (Retaliation , National Origin)	5/31/10	Insufficient evidence - No Adjustment
Grand Rapids, MI	Wyoming, MI	Grand Rapids, MI	Housing, Dominican, Black or African American, E-mail, Referred by HUD, Real Estate; Rental; Leasing, Failure to rent (National Origin, Race) (Other (Write In))	6/21/10	Insufficient evidence - No Adjustment
Kentwood, MI	Kentwood, MI	Kentwood, MI	Housing, Black or African American, Telephone, Referred by HUD, Other, Failure to rent (Race)	6/21/10	Insufficient evidence - Adjustment
Grandville, MI		Grand Rapids, MI	Housing, E-mail, Referred by HUD, Advertising (Familial Status)	6/30/10	Settlement Agreement

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Fair Housing Discrimination Complaints

Discrimination address	Claimant Address	Respondent address	Issue/Basis	Close Date	Close Type
	Grand Rapids, MI	Cedar Springs, MI	Housing, E-mail, Referred by HUD, Advertising (Familial Status)	7/19/10	Settlement Agreement
Cedar Springs, MI	Cedar Springs, MI	Cedar Springs, MI	Housing, E-mail, Referred by HUD, Eviction (Disability , Physical Disability) (Heart/cardiovascular impair., Other respiratory/pulmonary, Back impairment)	7/29/10	Insufficient evidence - Adjustment
Cedar Springs, MI	Kalkaska, MI	Cedar Springs, MI	Housing, Telephone, Referred by HUD, Business services,	7/30/10	Withdrawn - Adjustment
Cedar Springs, MI	Cedar Springs, MI	Cedar Springs, MI	Housing, E-mail, Referred by HUD, Failure to accom. disability (Disability, Physical Disability) (Other (Write In))	8/19/10	Settlement Agreement
	Caledonia, MI	Caledonia, MI	Housing, White, Telephone, Other, Other terms & conditions ()	9/14/10	Lack of Jurisdiction for MDCR
Kentwood, MI	Grand Rapids, MI	Kentwood, MI	Housing, Mexican, Telephone, Referred by HUD, Other, Other terms & conditions (National Origin)	10/29/10	Settlement Agreement
Sparta, MI	Grand Rapids, MI	Chicago, IL	Housing, E-mail, Referred by HUD, Advertising (Familial Status)	10/29/10	Settlement Agreement
Kentwood, MI	Grand Rapids, MI	Kentwood, MI	Housing, Mexican, E-mail, Referred by HUD, Other, Other terms & conditions (National Origin)	10/30/10	Settlement Agreement
Wyoming, MI		Wyoming, MI	Housing, E-mail, Repeat customer, Advertising (Familial Status)	11/15/10	Post-Investigation Settlement Agreement / Adjustive Action
Rose City MI	West Branch, MI	Cedar Springs, MI	Housing, Telephone, Claims by others, Business services, Failure to rent (Disability, Mental Disability) (Post-Traumatic Stress Disorder)	11/16/10	Insufficient evidence - No Adjustment

VIII. Appendix

Fair Housing Discrimination Complaints

Discrimination address	Claimant Address	Respondent address	Issue/Basis	Close Date	Close Type
	Wyoming, MI	Gowen, MI	Housing, Telephone, Other, Other terms & conditions ()	12/13/10	Lack of Jurisdiction for MDCR
Kentwood, MI	Grand Rapids, MI	Kentwood, MI	Housing, Other Hispanic / Latino, Telephone, Mass media, Other terms & conditions (National Origin)	12/29/10	Insufficient evidence - No Adjustment

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